EXHIBIT 1

REDACTED

Case 1:23-cv-00108-LMB-JFA   Document 1739-1   Filed 09/13/25   Page 2 of 46
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Case 1:23-cv-00108-LMB-JFA   Document 1733-1   Filed 09/12/25   Page 2 of 46
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1

1   IN THE UNITED STATES DISTRICT COURT.
    FOR THE EASTERN DISTRICT OF VIRGINIA
2   ALEXANDRIA DIVISION
                  -   -   -
3

    UNITED STATES, et al., :
4   :   NO.
         Plaintiffs,   :   1:23-cv-00108
5   :   -LMB-JFA
         v.   :
6   :
    GOOGLE LLC,   :
7   :
         Defendants.   :
8

9   - HIGHLY CONFIDENTIAL -

10   -   -   -

11   August 27, 2025

12   -   -   -

13   Videotaped deposition of
    GORANKA BJEDOV, Ph.D., taken pursuant to
14   notice, was held at the Department of
    Justice, 450 9th Street, NW, Washington,
15   D.C., beginning at 9:05 a.m., on the
    above date, before Michelle L. Ridgway, a
16   Registered Professional Reporter,
    Certified Shorthand Reporter, Certified
17   Realtime Reporter, Certified Court
    Reporter, and Notary Public.

18

19   -   -   -

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21

22

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Goranka Bjedov
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 1           All counsel will be noted
 2    on the stenographic record.
 3           The court reporter is
 4    Michelle Ridgway, also with
 5    Lexitas.
 6           And would you please swear
 7    in the witness.
 8           (Witness sworn.)
 9                  -  -  -
10           ... GORANKA BJEDOV, Ph.D.,
11    having been first duly sworn,
12    was examined and testified as
13    follows:
14                  -  -  -
15              EXAMINATION
16                  -  -  -
17    BY MS. RHEE:
18       Q.   Good morning.
19       A.   Good morning.
20       Q.   I want to start off by
21    asking whether or not you've ever been
22    deposed before.
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 1       A.   Never.
 2       Q.   Okay.
 3       A.   Sorry.
 4       Q.   Lucky you.
 5       A.   Yeah.  Depends on how you
 6    look at it, but...
 7       Q.   Okay.  Given that, just
 8    want to go over some basic ground rules.
 9    I'm sure they've already been covered,
10    but just on the record --
11       A.   Of course.
12       Q.   -- I will be asking you
13    questions.
14       A.   Mm-hmm.
15       Q.   I need you to wait for me
16    to finish asking the question, and then
17    I will wait for you to answer, then back
18    and forth.  Okay?
19       A.   Makes sense.  Yes.
20       Q.   Okay.  Let me begin by just
21    asking about your background.  Okay?
22       A.   All right.
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 1       Q.   Okay.  So I think I
 2    understand your undergraduate degree is
 3    from Purdue University; is that right?
 4       A.   No, that is not correct.
 5           My undergraduate degree is
 6    from University of Zagreb.
 7       Q.   Okay.
 8       A.   Z-A-G-R-E-B.  Currently,
 9    the capital of Croatia.  But it was
10    obtained during the time of Yugoslavia.
11       Q.   Okay.  And that was a
12    Bachelor of Science?
13       A.   By American standard, it
14    would be actually considered Bachelor's
15    of Engineering.
16       Q.   Okay.
17       A.   But when it was translated,
18    I didn't know, so it was translated as
19    Bachelor's of Science.  It was a
20    five-year degree, basically.
21       Q.   In engineering?
22       A.   In engineering and with
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 1    thesis.  Yes.
 2       Q.   Okay.  And it was civil
 3    engineering; is that right?
 4       A.   That is correct.  It was
 5    civil engineering, yes.
 6       Q.   For those of us who do not
 7    have an engineering background --
 8       A.   Mm-hmm.
 9       Q.   -- how would you describe
10    what civil engineering is?
11       A.   So civil engineering is an
12    oldest area of engineering, and it
13    concerns itself with things like -- you
14    have several different subfields, so I'm
15    going to go through those.
16           For example, you have
17    probably the oldest one is the -- what
18    we call the static subfield, and that
19    one concerns itself with building
20    structures, like buildings.  To a lesser
21    extent, bridges.  But you're talking
22    about large buildings.
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 1            You have fluid mechanics,
 2  which happens to be my subfield of
 3  specialization.  And that one really
 4  concerns itself with everything related
 5  to not just, you know, water and sun,
 6  but also things like air, you know,
 7  basically fluid motion, fluid movement,
 8  and is highly computational field.
 9            Then you have the third
10  field that is -- depending on where you
11  -- how you call it, but let's -- let's
12  call it traffic engineering.  These are
13  the people that focus on roads,
14  airports.
15            In my system, in my world,
16  traffic engineering did not involve
17  things like, you know, traffic lights
18  and directing the traffic but just
19  really building things that are related
20  to that.
21            Then you have, for example,
22  geotechnical engineering, which is also
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 1  highly computational, and that one is
 2  involved with all aspects of all of our
 3  structures, everything that we built
 4  stands on the ground.
 5            And the ground is a fairly
 6  complex mix of many particulate and
 7  nonparticulate soils.  And so
 8  geotechnical engineering, their job is
 9  to tell you what you're really standing
10  on, what can you expect of your
11  substrate to give you so that you can
12  then build the appropriate foundation
13  and things like that.
14            They also have a
15  subspecialty, especially in California,
16  earthquake engineering.  So earthquake
17  engineering would be a subfield of
18  geotechnical engineering, and so those
19  two fields obviously also highly
20  computational.
21            I think that pretty much
22  summarizes the whole field, yes.
```

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 1       Q.    Okay.  That's super
 2  helpful.
 3            And after you received your
 4  undergraduate degree in Croatia, it
 5  looks like you came to the United
 6  States; is that right?
 7       A.    That is correct.  I came to
 8  the United States.
 9       Q.    Okay.  And you got a
10  Master's of Science in civil engineering
11  from Clarkson University?
12       A.    That is correct.
13       Q.    Okay.  And, again, was your
14  subspecialty at that time fluid
15  mechanics --
16       A.    Computational fluid
17  mechanics, yes.  Correct.
18       Q.    Okay.  Okay.  And then you
19  stayed at Clarkson, it looks like, and
20  you got a Ph.D. in engineering science;
21  is that right?
22       A.    That is correct.  Yes.
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 1       Q.    Okay.  And, again, was the
 2  specialty of fluid engineering?
 3       A.    It was computational fluid
 4  mechanics.  Yes.
 5       Q.    Okay.  And then after that
 6  it looks like you went to Purdue and got
 7  a Master's of Science; is that right?
 8       A.    That is also correct.  Yes.
 9       Q.    Okay.  And at that point,
10  that's when you studied computer
11  science?
12       A.    No.  That -- that is
13  incorrect.
14       Q.    Okay.
15       A.    You started with my
16  undergraduate degree.
17       Q.    Yeah.
18       A.    Prior to my undergraduate
19  degree, my undergraduate -- sorry -- my
20  high school education was in computer
21  science, and in particular, in
22  informatics.
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1   And so I started
2   programming when I was 13. I went to
3   the high school for informatics. By the
4   time I was 18, I was a little bit burnt
5   out of coding, and so I decided to study
6   a different field of engineering.
7   And -- but throughout all
8   of my studies, you really can't get a
9   master's these days, or even a Ph.D.,
10 without coding. And so I'm continuing
11 to code and program.
12   But during this time, also,
13 the whole space develops tremendously.
14 You start getting new programming
15 languages and so on.
16   And so by the time that I
17 get a job at Purdue as a faculty
18 teaching program to engineering
19 students, I have decided to basically
20 take a formal look at the field that
21 I've been in for a long time and, you
22 know, bring my knowledge to the level

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1   that I felt it should be. And so that's
2   when I get my master's in computer
3   science.
4   You will note that that
5   master's was not thesis master's. I was
6   mostly interested in coursework.
7   Q.   Okay. That's very helpful.
8   And that is the sum total
9   of your educational background; is that
10 right?
11   MR. TESLICKO: Object to
12   form.
13   THE WITNESS: So, no, not
14   really.
15   When you are faculty, you
16   receive a lot of additional
17   training. I'm not sure how much
18   detail you want to go into.
19 BY MS. RHEE:
20   Q.   Yeah. Let me -- let me
21 rephrase the question, then.
22   Do you have any other

Page 20

1   degrees, other than the ones we covered?
2   A.   No, I do not have any
3   degrees, additional.
4   Q.   Okay. Okay. And then your
5   teaching experience, I take it, was when
6   you were at Purdue; is that right?
7   A.   I have teaching experience
8   at Purdue, but I've actually been
9   instructor in the last two years of my
10 Ph.D. at Clarkson.
11   So as an instructor you
12 also teach classes, and so I -- I've
13 done that at Clarkson as well. So I
14 have two years of teaching experience
15 there and then seven years of teaching
16 experience at Purdue.
17   Q.   Okay. So let me just put
18 some dates to that.
19   A.   Sure.
20   Q.   Your teaching experience at
21 Clarkson was in the last two years of
22 your Ph.D.?

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1   A.   That is correct.
2   Q.   Okay. So that's 1990 to
3   1992?
4   A.   No. It is 1989 to 1991.
5   Q.   Okay. Thank you.
6   And then your seven years
7   of experience at Purdue, what are those
8   years?
9   A.   Those are 1991 to 1998.
10   Q.   Okay. And what was your
11 title when you were teaching at Purdue?
12   A.   I was -- at Purdue I was --
13 for most of the time, I was assistant
14 professor. But for the last year, I was
15 associate professor. I don't remember
16 the exact time on when I was promoted to
17 associate, when I got tenure. But I --
18 probably '97 -- '97, most likely.
19   Q.   Okay. And this was in the
20 School of Civil Engineering?
21   A.   No. This was in the
22 department -- well, actually, yes, it

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 1   guess the middle of 2010 through
 2   February of 2019, you were at Facebook?
 3        A.    That is correct as well.
 4        Q.    Okay.  And your title at
 5   Facebook was a performance and capacity
 6   engineer?
 7        A.    That is correct as well.
 8   Yes.
 9        Q.    Okay.  And since February
10   of 2019 --
11        A.    Mm-hmm.
12        Q.    -- where have you been
13   working?
14        A.    I haven't.
15        Q.    Lucky you.
16        A.    You know, I would like to
17   invite all of you to join me.
18        Q.    That sounds delightful.
19        A.    So to answer your question,
20   since February '19 I have been mostly
21   hiking around the world.  So I've hiked
22   two different caminos.  I've just
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 1   finished Tour du Mont Blanc.  I've done
 2   the Inca Trail.  I happen to spend a lot
 3   of my time hiking.
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14        Q.    Okay.  That's super
15    helpful.
16              When you say that you were
17    a high-level Facebook employee --
18        A.    Mm-hmm.
19        Q.    -- I think I have that
20    right -- what do you mean by high level?
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10        Q.    Okay.
11        A.    So you have two different
12    tracks.  You have an engineering IC
13    track, which is the part that I am of,
14    and inside that track, yes, I believe
15    there was maybe five people.
16              Inside management, they may
17    have had 2,000, for all I care.  I have
18    no idea how many managers were that
19    level.
20        Q.    Okay.  That's helpful.
21              So you were not a manager
22    at Facebook?
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1 A. No, I was not a manager at 2 Facebook. 3 Q. All right. You were an 4 individual contributor? 5 A. That is correct. Yes. 6 Q. Okay. And so you are only 7 talking about seniority levels for 8 individual contributors? 9 A. Very correct. For 10 engineers. 11 Q. Okay. Well, but there are 12 lots of engineers who are managers as 13 well, correct? 14 A. There are a lot of 15 engineers who make the transition to the 16 management track, yes. 17 Q. Okay. Okay. So your 18 testimony about being ███████████ 19 ██ ████████████ -- 20 A. Mm-hmm. 21 Q. -- for engineers are about 22 individually contributing engineers?	1 substance of any communications 2 with counsel. 3 THE WITNESS: Yeah. So, 4 basically, I was contacted by 5 the plaintiffs, and we discussed 6 things, and I decided to accept 7 their request to help them put 8 together my -- my report. 9 BY MS. RHEE: 10 Q. Okay. And when was that? 11 A. First contact was about two 12 years ago. Yes, two years ago. Summer 13 2023. But then nothing really happened 14 until -- I think we finished all the 15 paperwork in, like, January of 2024. 16 Don't hold me on the -- but, roughly, 17 that timeframe. 18 Q. Okay. Okay. At the time 19 that Plaintiffs contacted you, you had 20 not done any expert work before; is that 21 right? 22 A. That is correct. Yes.

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1 A. Yes. 2 Q. This is very helpful. I 3 appreciate the clarification. 4 And since February of 2019, 5 you have been -- is it fair to say 6 retired? 7 A. Yes. 8 Q. Okay. 9 A. I consider myself retired. 10 Yes. 11 Q. Okay. How did you come 12 about being retained in this case? 13 MR. TESLICKO: I just 14 remind the witness not to 15 disclose the substance of any 16 communications with Plaintiffs' 17 counsel. 18 THE WITNESS: So I was 19 contacted by the plaintiffs and 20 asked if I felt that I could -- 21 MR. TESLICKO: Just remind 22 you not to disclose the	1 Q. Okay. Do you know how 2 Plaintiffs found you? 3 MR. TESLICKO: I just 4 remind the witness again not to 5 disclose the substance of any 6 communications with counsel. 7 THE WITNESS: I actually 8 don't, no. 9 BY MS. RHEE: 10 Q. So you got a call out of 11 the blue, at least from your 12 perspective? 13 A. From -- from my 14 perspective. And I can even describe 15 the situation. I got an e-mail while I 16 was on one of my trips, and I'm -- 17 Q. And you went to an internet 18 cafe and got some Wi-Fi. 19 A. -- as you can imagine that 20 it impacted that particular day, and -- 21 Q. Where were you? 22 A. I was in Croatia at the

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 1   time.  I was, actually, after my trip,
 2   with my mom.  That's why I remember the
 3   timing.
 4              And -- and so I responded
 5   to that particular e-mail, and, you
 6   know, obviously this is your world.  And
 7   for maybe for all of you, this would be
 8   like, well, you know, it's just DOJ.
 9   For me it's like, oh, my God, what did I
10   do now.
11              And -- and so we set up the
12   time to talk on the phone, time
13   differences being what they are.
14              We ended up talking, and,
15   obviously, that communication, my
16   understanding is it's protected.  And
17   so --
18       Q.    I got it.  Okay.
19       A.    Mm-hmm.
20       Q.    Have you been retained in
21   any other case to provide expert work?
22       A.    No.
```

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 1       Q.    Okay.  So this is the one
 2   and only?
 3       A.    This is my one and only,
 4   yes.
 5       Q.    Okay.  Based on that, I
 6   take it you've never put yourself up as
 7   a testifying expert before?
 8       A.    So there was one situation
 9   where I was specifically requested by a
10   congressperson from Indiana to be
11   provided by Facebook to testify in
12   Congress hearings.
13              Not sure whether you
14   consider that or not, but there -- there
15   was that particular experience as well.
16       Q.    Okay.  And did you actually
17   testify before Congress?
18       A.    I was present at the
19   hearings.
20       Q.    What does it mean to be
21   "present at the hearings"?
22       A.    So they had hearings --
```

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 1   this is 2012, 2013.  So I can tell you
 2   that Mr. Eric Cantor was the Speaker of
 3   the House at the time.
 4       Q.    Okay.
 5       A.    I -- whatever.  He was
 6   Republican lead at the time.
 7       Q.    Okay.
 8       A.    So he was -- he was -- it
 9   was during his tenure.
10       Q.    Okay.
11       A.    And they were the
12   Republican caucus.  And I apologize,
13   because all of these terms are very much
14   outside of my normal vocabulary, so if I
15   misuse some of them, I'm sorry.
16              They were having a hearing
17   on, you know, status of women in
18   technology and -- and in those fields.
19   And in particular, I received a request
20   from Facebook's office in Washington
21   that I be present.  That was very
22   unusual.  And the explanation was that
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 1   there was a particular congressperson
 2   from Indiana who wanted me -- who wanted
 3   Facebook to provide me as a witness.
 4              Again, in that kind of
 5   situation, you just do what your company
 6   wants you to do.  And I was in
 7   Washington, D.C., present at the
 8   hearings.
 9       Q.    So physically present?
10       A.    Physically present, yeah.
11   I was in the room, sitting next to the
12   congresswoman, and watched the whole
13   thing sort of go around me.
14       Q.    Okay.  So you watched the
15   hearing.
16              Did you talk at the
17   hearing?
18       A.    No.
19       Q.    Okay.
20       A.    I was instructed by our
21   team to not say anything unless I was
22   specifically asked a question.  Nobody
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 1        list of candidates in this
 2        field.  Like -- no.
 3   BY MS. RHEE:
 4        Q.   Okay.
 5        A.   This is completely outside
 6   of my area of expertise.
 7        Q.   Okay.  So also safe to say
 8   you've never written an expert report
 9   before?
10        A.   That is very correct.  Yes.
11        Q.   Okay.  How many people from
12   Keystone Strategy were assigned to help
13   you?
14        A.   I actually don't know the
15   answer to that question.
16        Q.   How do you not know?
17        A.   I can only tell you,
18   roughly, how many people I interacted
19   with.
20        Q.   Okay.
21        A.   But were there people doing
22   work that, you know, I am unaware of?  I
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 1   don't know.  So I don't -- I honestly
 2   don't know the answer to your question.
 3             I personally interacted
 4   with -- let me think -- maybe ten
 5   people.  Again, order of magnitude.
 6        Q.   Okay.
 7        A.   So ten.
 8        Q.   Okay.  How many hours have
 9   you personally spent in preparation of
10   your reports in this case?
11        A.   That is a very complex
12   question.  I -- let me think.
13             Approximately, couple of
14   hundred hours, I would guess.  Yeah, I
15   would -- I would guess couple of hundred
16   hours, maybe 300.
17        Q.   Okay.  Well, you're
18   charging by the hour, right?
19        A.   I am.
20        Q.   Okay.  And sitting here
21   today, you don't know how much you've
22   charged so far?
```

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```
 1        A.   I do know the answer to
 2   that question.
 3        Q.   Okay.
 4        A.   So I have -- so far I have
 5   charged about $150,000 --
 6        Q.   Okay.
 7        A.   -- total.
 8             I have been paid out
 9   $80,000.  So $80,000.  That's 200 hours.
10   Yeah.  So a couple hundred hours.  Like
11   500 hours or so.
12        Q.   Okay.  Yeah.  Sorry.  I
13   can't do math, hence I took out my phone
14   to pull out the calculator.
15        A.   No, no.  That's fine.
16             But I do remember -- as I
17   said, I do remember the exact numbers
18   for how much I have billed for and how
19   much I have been -- received payment
20   for, but I haven't billed for all of the
21   hours yet.
22        Q.    Okay.  So sitting here
```

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```
 1   today, your best approximation is about
 2   500 hours; is that what I'm hearing?
 3             MR. TESLICKO:  Object to
 4        form.
 5             THE WITNESS:  I would
 6        guess 500 hours, yes, on
 7        preparation of reports.  Yes,
 8        that sounds reasonable.
 9   BY MS. RHEE:
10        Q.   Okay.  Do you know how many
11   hours the staff at Keystone have worked
12   on your report?
13        A.   Not the slightest idea.
14        Q.   Okay.  How did you go about
15   selecting what you reviewed in
16   connection with your report?
17        A.   So as I'm sure you're
18   aware, there was a mountain of documents
19   in this case.
20        Q.   You don't say.
21        A.   And so my strategy for --
22   when you get the mountain, there is no
```

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```
 1   way I can --
 2        Q.    Well, did you get a
 3   mountain?
 4        A.    Oh, yeah.  I had access to
 5   everything that was produced in the
 6   case.
 7        Q.    Okay.
 8        A.    And so now I -- you know, I
 9   see all of these documents, and I see
10   the timelines.  And I'm going, like, all
11   right.
12        Q.    When you say "timelines,"
13   what do you mean?  What are you
14   referring to?
15        A.    Oh, I'm talking about when
16   my report needs to be written and then
17   when the rebuttal report needs to be
18   written --
19        Q.    I see.
20        A.    -- and then the reply
21   report.
22              From my perspective, this
```

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```
 1   is all moving fairly quickly.  But,
 2   again, I'm giving you a judgment on
 3   something that I really have no basis
 4   for comparison.  So you may disagree and
 5   you may reasonably say no, no, no, this
 6   is a very slow one.
 7              For me, personally, I felt
 8   that things were moving quickly.
 9        Q.    Okay.  So when did you
10   first get access to, as you put it, the
11   mountain of documents in connection with
12   when you thought your first report was
13   due?
14        A.    I really don't remember.  I
15   honestly don't remember.  This was a
16   long time ago.  I would really hate to
17   make a guess here.  I don't remember.
18   I'm sorry.
19        Q.    Okay.  Well --
20        A.    A long time ago.
21        Q.    -- what do you mean by "a
22   long time ago"?  In 2025?
```

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```
 1        A.    I think I've had access to
 2   some of the stuff before 2025.
 3        Q.    Okay.
 4        A.    But definitely not all of
 5   the stuff.
 6        Q.    Okay.
 7        A.    But there was just a lot of
 8   documents.
 9        Q.    Okay.  And can I ask --
10   because what we have, as I'm sure you
11   know --
12        A.    Mm-hmm.
13        Q.    -- because they are your
14   reports, the Appendix A for each one of
15   your reports --
16        A.    Mm-hmm.
17        Q.    -- lists the materials that
18   you relied upon for that report, right?
19        A.    It lists a subset of
20   materials that -- in particular,
21   materials that I referred to and quoted
22   in the report.
```

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```
 1              I've certainly reviewed a
 2   lot more things that I don't necessarily
 3   quote because I find them not relevant
 4   to the matter that I'm discussing.
 5        Q.    Okay.  So I want to make
 6   sure I understand.
 7              What you put in those
 8   appendices to your report --
 9        A.    Mm-hmm.
10        Q.    -- is only what you cited?
11        A.    That is correct.  Yes.
12        Q.    But that is not -- let me
13   make sure I break this down.
14              It is not everything that
15   you reviewed?
16        A.    That is correct.  Yes.
17        Q.    Okay.  And I take it, it is
18   not everything you relied upon --
19              MR. TESLICKO:  Object to
20        form.
21   BY MS. RHEE:
22        Q.    -- if you didn't actually
```

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```
 1   cite it?
 2              MR. TESLICKO:  Object to
 3         form.
 4              THE WITNESS:  No.  If I am
 5         using a document to form my
 6         opinion or if I'm using a
 7         document to -- let's put it this
 8         way -- to say, well -- and here
 9         is a document that confirms my
10         opinion, then I'm going to cite
11         it.
12   BY MS. RHEE:
13         Q.    Okay.
14         A.    But if I'm just reading a
15   document -- for example, I've read
16   transcripts of depositions, of -- number
17   of them.  And I apologize.  I'm really
18   terrible with names.
19         Q.    Okay.
20         A.    But I've read the
21   transcripts from several Google
22   witnesses in the case.  I've read them
```

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```
 1   for several reasons.  Because I wanted
 2   to see what this process looks like, but
 3   also I wanted to understand, you know,
 4   what are they saying, what are they
 5   claiming.  Are they saying things that I
 6   will strongly disagree with and say,
 7   well, no, that's just wrong, and I can
 8   prove it is wrong.
 9              Or are they saying things
10   that you can look at and go, like, well,
11   I disagree with them, but, objectively,
12   it's quibbling.
13              And so I read a lot of
14   those depositions.  I don't cite them in
15   my report.  They were completely
16   irrelevant to it.
17         Q.    Okay.  I think I
18   understand.
19              You cite, I think, 30 -- I
20   think the count is something around 32
21   unique Google documents across your
22   three reports.
```

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```
 1              Does that sound roughly
 2   right to you?
 3         A.    Oh, I remember there was
 4   about 20, 21 in the first report, so the
 5   numbers, order of magnitude, certainly
 6   makes sense, yes.
 7         Q.    Okay.
 8         A.    And then there is a whole
 9   lot of other documents that I cite --
10         Q.    I totally understand, but I
11   just want to focus on the
12   Google-produced documents for now.
13         A.    All right.
14         Q.    Okay.  You're right.  You
15   cite -- or you list 20-some-odd Google
16   documents in your opening report.
17         A.    Mm-hmm.
18         Q.    And then in total it's
19   about 30.  Sound about right?
20         A.    Sounds fair.  Yes.
21         Q.    Okay.  And based on your
22   answer just now, that is the universe of
```

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```
 1   Google-produced documents, out of the
 2   mountain of documents that you had
 3   access to, that you either cited in your
 4   reports or otherwise relied upon; is
 5   that right?
 6              MR. TESLICKO:  Object to
 7         form.
 8              THE WITNESS:  So there are
 9         other Google documents that I
10         have read and thought, oh,
11         they -- ███████████████
    ██  ██████████████████████████
12
13         that I didn't cite because,
14         honestly, the form that they
15         were written in, I totally
16         understand.  They were
17         engineers.
18              But I didn't think that in
19         the legal sense it would be very
20         helpful to either you or the
21         judge to see ██████████████
    ██  ████████████████████████
22
```

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1   which makes perfect sense in my
2   world, but I'm going to guess
3   that anybody else will go, like,
4   what in the world are these
5   people talking about.
6   ███████████████████
     ███████████████
     ███████████████████
     ███████████████████
     █████████████████████
     ██ ███████████████
     ████████████████
13   But how do you present to
14   anybody else outside of the
15   technology space what████████
     ████████████████████
     ███████████████
     ███████████████
     ██ █████ .
20   BY MS. RHEE:
21   Q.   So you're referring to a
22   document produced by Google that you

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1   read --
2   A.   Mm-hmm.
3   Q.   I think you need to just
4   say yes or no on the record.
5   A.   Oh. Yes.
6   Q.   -- that you believe is
7   ███████████████████████?
8   A.   That is correct.
9   MR. TESLICKO: Object to
10   form.
11   Sorry.
12   THE WITNESS: Sorry.
13   BY MS. RHEE:
14   Q.   But you did not cite it?
15   MR. TESLICKO: Object to
16   form.
17   THE WITNESS: Could you
18   repeat the question, please.
19   And sorry about that.
20   BY MS. RHEE:
21   Q.   Yeah. I'm sure you've been
22   instructed. Mr. Teslicko is doing his

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1   job, but regardless of his objection,
2   unless he specifically instructs you not
3   to answer, you need to answer my
4   question.
5   A.   And I hope, you know, that
6   so far I haven't --
7   Q.   You've been great. I'm
8   really just talking to Mr. Teslicko.
9   MR. TESLICKO: If I could
10   just say, can you please wait
11   for counsel to finish her
12   question full, because that's
13   part of the problem. That would
14   be great.
15   THE WITNESS: I'm really
16   sorry for making this difficult
17   for you.
18   BY MS. RHEE:
19   Q.   You're fine. So let's just
20   rewind.
21   You just talked about a
22   document produced by Google that you

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1   reviewed, correct?
2   A.   That is correct.
3   Q.   Okay. You did not put it
4   on any of your appendices, correct?
5   A.   That is also correct, yes.
6   Q.   Okay. But, nevertheless,
7   you believe that document ███████████
     ████████████████████?
9   MR. TESLICKO: Object to
10   form.
11   THE WITNESS: I would say
12   that -- that my evaluation was
13   ██████████████████████
     ████████████████████████
     ██████████ .
16   BY MS. RHEE:
17   Q.   So it went into your
18   thinking about this case?
19   MR. TESLICKO: Object to
20   form.
21   THE WITNESS: Not really.
22   Outside of, man, if I were

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1   presenting this to a bunch of
2   engineers, ████████████████
███████████████████████████████
███████████████████████████████
███████████████████████. But,
6   unfortunately, that's not my
7   audience, so, you know.
8   Outside of that, no, I --
9   you know, it's --
10   BY MS. RHEE:
11   Q.   Okay. Let me try this
12   again.
13   A.   Mm-hmm. Mm-hmm.
14   Q.   This is one example of a
15   document that is on topic, related to
16   your opinion, but you did not put it on
17   any of the appendices. Yes?
18   MR. TESLICKO: Object to
19   form.
20   THE WITNESS: This is one
21   document that I believe -- and I
22   really believe most engineers

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1   would agree with me on this --
2   ████████████████████████████.
3   And this is one document
4   that I didn't include in the --
5   and I didn't cite and refer to
6   because I felt it was maybe --
7   let's call it too informal and
8   could be reasonably questioned
9   by anybody who hasn't worked and
10   lived in the world that I work
11   in and live in, as to how is
12   this even relevant.
13   BY MS. RHEE:
14   Q.   Okay. And how many more
15   documents did you review that Google had
16   produced, that you had access to, that
17   was topically related to the subject
18   matter of your opinion but, for one
19   reason or another, you decided not to
20   put down in your appendices?
21   MR. TESLICKO: Object to
22   form.

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1   THE WITNESS: Oh. Oh,
2   wow. Really no idea.
3   BY MS. RHEE:
4   Q.   Well, more than one?
5   A.   More than one.
6   Q.   Okay. More than ten?
7   A.   You are asking me to
8   estimate, in legal proceedings,
9   something that I really -- if I had
10   known that I should keep track of, you
11   know.
12   Q.   That's okay. I just want
13   your best guess.
14   MR. TESLICKO: Object to
15   form.
16   THE WITNESS: My best
17   guess would be somewhere between
18   10 and 20, maybe.
19   And you did add a
20   stipulation there that --
21   because some documents I would
22   run into would be talking about

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1   business stuff or -- so on, and
2   those -- those, I immediately
3   dismiss because they don't --
4   they have nothing to do with
5   work I'm doing and what I have
6   been asked to opine on.
7   Do you count the document
8   or not, and how many of those --
9   let's say somewhere between 10
10   and 20.
11   BY MS. RHEE:
12   Q.   Okay. That's your best
13   guess, sitting here today?
14   A.   That is my best guess, yes.
15   Q.   Okay. Your opinion goes
16   through your timeline estimates for the
17   various DOJ steps or phases of remedy;
18   is that right?
19   MR. TESLICKO: Object to
20   form.
21   THE WITNESS: So my
22   opinion gives timelines for

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```
1        different parts of Plaintiffs'
2        proposed remedies.
3   BY MS. RHEE:
4        Q.    Yes.  Okay.  So let's just
5   quickly go through those.  Right?
6        A.    Mm-hmm.
7        Q.    DOJ's proposed remedies for
8   what they refer to as DFP --
9        A.    Mm-hmm.
10       Q.    -- goes in three phases,
11  right?
12       A.    That is correct.
13       Q.    Okay.  And the first phase,
14  which is a form of integration, right?
15  The first phase is a Prebid integration,
16  right?
17            MR. TESLICKO:  Object to
18       form.
19            THE WITNESS:  Excuse me?
20       You say form of integration?
21       Could you tell me what you mean
22       by that.
```

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```
1   BY MS. RHEE:
2        Q.    Well, actually, maybe I
3   should ask you.
4            What is the first phase
5   that you opine upon?
6        A.    So the first phase of DFP
7   divestiture -- and you can see in my
8   report -- is creation of the APIs.
9   Those --
10       Q.    APIs to what?
11       A.    So you're looking at,
12  basically, application program
13  interfaces that would make Google
14  participate on the same level as other
15  exchanges in bidding process.
16       Q.    Okay.  So APIs to what?
17       A.    So APIs to make Google
18  participate on the same level to the
19  bidding process.
20       Q.    Well, do you know how APIs
21  effectuate that?
22            At least as I understand
```

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```
1   APIs, they actually need to connect to
2   something, right?
3            MR. TESLICKO:  Object to
4       form.
5            THE WITNESS:  So in order
6       for API to be useful, you
7       typically are connecting to a
8       system.
9   BY MS. RHEE:
10       Q.    Mm-hmm.
11       A.    And it's the system that
12  exposes its API.
13            So you have exchanges, and
14  inside those exchanges, there is a
15  bidding process going on.  Those
16  exchanges have APIs.
17            And what we're saying is,
18  Google needs to provide APIs that would
19  level the playing field for the
20  bidding -- during the bidding process.
21       Q.    Mm-hmm.  Okay.
22            And what is the timeframe
```

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```
1   that you estimate in order for those
2   APIs to be created and confirmed to work
3   as intended?
4            MR. TESLICKO:  Object to
5       form.
6            THE WITNESS:  So I specify
7       that in my report.
8            And I -- is it okay if I
9       point out to where this is in my
10      report?
11  BY MS. RHEE:
12       Q.    We can get there.
13            But I just want to know,
14  since this is your opinion --
15       A.    Mm-hmm.
16       Q.    -- it's less about your
17  report, but just your opinion.
18            Do you know how long you
19  estimated that step to take?
20            MR. TESLICKO:  Object to
21       form.
22            THE WITNESS:  I can answer
```

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```
 1         the question.  I do want to give
 2         you a caveat that there are many
 3         different parts, moving parts,
 4         in this particular case, and so,
 5         to the best of my recollection,
 6         which could be off in this case,
 7         if I remember correctly, it was
 8         18 months.
 9              It could go as high as 24,
10         but I think 18 months is a
11         reasonable amount of time for
12         creation of APIs.
13  BY MS. RHEE:
14         Q.    Okay.  And then you opine
15  about the next step in DOJ's proposal to
16  divest DFP, right?
17         A.    Mm-hmm.  That is correct.
18         Q.    Okay.  And what is your
19  understanding of what that Phase 2 is?
20         A.    So as per Plaintiffs'
21  proposed remedies, Phase 2 is
22  open-sourcing of the final auction logic
```

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```
 1  and making it available in an
 2  open-source context.
 3         Q.    Okay.  And what is your
 4  opinion about how long that's going to
 5  take?
 6         A.    Again, that has been
 7  defined in my -- in my report, so I'm
 8  not quite sure --
 9         Q.    Well, it's your opinion,
10  right?
11         A.    In my opinion, as defined
12  in my report -- and I do want to say
13  what is in the report should be taken as
14  the accurate statement in this.  You're,
15  again, looking at a timeframe of
16  18 months to 24 months.
17         Q.    Okay.  And then you opine
18  about how long it's going to take to
19  achieve what DOJ calls Phase 3 of DFP
20  divestiture, right?
21         A.    That is correct.  Yes.
22         Q.    Okay.  And what is your
```

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```
 1  understanding of what Phase 3 entails?
 2         A.    So my understanding of
 3  Phase 3 is that it involves what I would
 4  call cutting out and moving DFP and
 5  making it available for purchase to one
 6  or more buyers.  Obviously, the DFP
 7  product that remains after Phase 1 and
 8  Phase 2 have been completed.
 9         Q.    Okay.  And what is your
10  opinion about how long that is going to
11  take?
12         A.    So, again, I would like to
13  refer you to my report.
14              I estimate that DFP
15  divestiture is going to take a little
16  bit longer than the other two things,
17  and there are specific reasons for it.
18              And I think my estimate is
19  that DFP by itself should be
20  somewhere -- let's call it in 24 to
21  30 months.
22         Q.    Okay.  And then, finally,
```

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```
 1  DOJ has a proposal to divest what it
 2  refers to as the Ad Exchange, or AdX,
 3  right?
 4         A.    That is correct.
 5         Q.    Okay.  And you have an
 6  opinion about how long that would take?
 7         A.    Yes, I do.
 8         Q.    Okay.  And how long would
 9  that take, in your opinion?
10         A.    In my opinion -- and,
11  again, I will point out to my report --
12  the AdX should take about 18 months.
13              And I should say this:  A
14  reasonable plan proposed in here should
15  take 18 months.  And I'm giving you just
16  one reasonable approach to that
17  divestiture.
18         Q.    What do you mean you're
19  giving "just one reasonable approach to
20  that divestiture"?
21         A.    So if you put five
22  engineers into a room and say divest
```

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```
 1   AdX, you will get seven different
 2   opinions back on how that can be done.
 3           I'm giving just one
 4   reasonable approach to doing this, which
 5   doesn't mean that somebody else may not
 6   come up with a different, equally
 7   reasonable approach.
 8       Q.    When you give these
 9   timeline estimates, is it fair to say it
10   is your best guess, sitting here today,
11   about how long something is going to
12   take?
13           MR. TESLICKO:  Object to
14       form.
15           THE WITNESS:  No, I -- I
16       don't think that is fair to say.
17   BY MS. RHEE:
18       Q.    Well, are you giving a
19   guarantee that any one of these phases
20   or projects can be completed within that
21   timeframe?
22           MR. TESLICKO:  Object to
```

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```
 1       form.
 2           THE WITNESS:  No, I'm not
 3       giving a guarantee on any of
 4       them.
 5   BY MS. RHEE:
 6       Q.    Okay.  And you would agree,
 7   in your experience working on projects
 8   in industry, every project has always
 9   slipped?
10           MR. TESLICKO:  Object to
11       form.
12           THE WITNESS:  Actually,
13       no.  And I'm going to, again,
14       refer to my -- my report and
15       give you an example of a project
16       that relates there.
```


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```
 5   BY MS. RHEE:
 6       Q.    Mm-hmm.
```

```
17       A.    Mm-hmm.
18       Q.    -- you remember filming a
19   video in connection with that project,
20   right?
21           MR. TESLICKO:  Object to
22       form.
```

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```
 1           THE WITNESS:  I'm not sure
 2       if you're talking about me
 3       giving a conference presentation
 4       at XKL in Boston.
 5           But I do remember that
 6       that is just one of the many
 7       talks, you know, technical
 8       talks, that are not listed in my
 9       résumé by, you know, line item
10       and line item.
11           But, yeah, I do remember
12       giving the talk.
13   BY MS. RHEE:
14       Q.    And, in fact, you cite it
15   in your report.
16           Do you know that?
17       A.    Yes.  Absolutely.
18       Q.    Okay.
19       A.    Because I kind of explain
20   in detail what was going on, and I feel
21   that, sitting here today, you can
22   reasonably say, oh, you're making stuff
```

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```
 1        up to them to decide.
 2        Completely out of my area of
 3        expertise to -- to opine on
 4        this.
 5   BY MS. RHEE:
 6        Q.    So your estimate of how
 7   long something like this would take --
 8        A.    Mm-hmm.
 9        Q.    -- isn't dependent on
10   whether or not any of these steps that
11   you're walking us through --
12        A.    Mm-hmm.
13        Q.    -- because they possibly
14   are part of the final auction logic,
15   also need to be open-sourced?
16        MR. TESLICKO:  Object to
17        form.
18        THE WITNESS:  All of these
19        steps are part of the code base.
20        My opinions are, hey, here
21        is the code base.  Do something
22        with it.
```

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```
 1        The process that I'm
 2        describing is agnostic to what
 3        the code base does.
 4   BY MS. RHEE:
 5        Q.    I take it from your answer,
 6   your opinion is also agnostic as to how
 7   many items within that code base either
 8   need or do not need to be open-sourced?
 9        MR. TESLICKO:  Object to
10        form.
11        THE WITNESS:  Yes, and a
12        no.
13   BY MS. RHEE:
14        Q.    Okay.
15        A.    You know, the answer to
16   that is, it depends.
17        Q.    What does it depend on?
18        A.    It depends on how the code
19   is organized.
20        So to give you a
21   hypothetical that -- I think most of my
22   colleagues at Google and probably most
```

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```
 1   of my colleagues at Facebook would be
 2   horrified.
 3        If all of these things were
 4   closely interacting with each other,
 5   coupled, looking at each other's private
 6   properties without any regard for
 7   computer standards or sort of computer
 8   coding standards, modern way of
 9   developing code, then it would make a
10   difference, because then -- honestly, it
11   would have to be rewritten and cleaned
12   up before it could be outsourced.
13        But, at least in my part of
14   the world, one of the things that Google
15   is certainly held in high esteem for,
16   and in my personal experience working
17   there, is sticking to very good computer
18   science methodology and being really
19   strict about how the code is checked in.
20        And, as a matter of fact,
21   in some of the documents that, you know,
22   your client has presented in this
```

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```
 1   case -- and I can't recall off the top
 2   of my head which ones -- they actually
 3   describe the process it goes through.
 4        Code reviews.  It has to be
 5   reviewed by the -- at least one other
 6   person.
 7        But, for example, if I'm
 8   trying to do the code check-in into code
 9   base that doesn't even belong to my
10   team, then it's going to be reviewed by
11   one other person, and it's going to be
12   reviewed by the owner of that particular
13   code base or subdirectory.  And those
14   are clearly identified.
15        So Google is pretty strict
16   about how they maintain their code base,
17   and, in my opinion, rightfully so.
18        And so I've, you know, made
19   my estimates with the understanding that
20   that is the code base that I'm dealing
21   with, and, therefore, I'm not going to
22   have to rewrite it.  I'm not going to
```

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```
 1  have to completely take it apart and
 2  spend three months figuring out, you
 3  know, why is this thing directly looking
 4  and pulling something from a memory, you
 5  know, at a particular location, because
 6  that is just not allowed at Google.  You
 7  don't -- you know, you don't do that.
 8       Q.    Okay.  For your assignment
 9  in this case --
10       A.    Mm-hmm.
11       Q.    -- you did not look at the
12  actual source code with respect to any
13  of these products, right?
14       A.    That is correct.  Yes.
15       Q.    It was just not part of
16  your assignment?
17       A.    That is not part of my
18  assignment.  That is correct.
19       Q.    Okay.  So insofar as you
20  talk about your assumptions --
21       A.    Mm-hmm.
22       Q.    -- about what the source
```

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```
 1            MR. TESLICKO:  Object to
 2       form.
 3            THE WITNESS:  That is
 4       actually incorrect.
 5            Well, I -- I worked on
 6       both AdSense and I had an intern
 7       actually do some work for
 8       AdWords.  And you could argue,
 9       you know, DFP gets integrated
10       fully after I leave Google.  So
11       not exactly this code base.
12            However, it is a code base
13       inside Google3.  And while I was
14       at Google, we completed
15       integration from Google2 to
16       Google3.
17            And so I'm familiar with
18       the rules, in particular for C++
19       code base.
20  BY MS. RHEE:
21       Q.    I just want to understand,
22  though.
```

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```
 1  code looks like, that is either based on
 2  your work at Google from 2005 to 2010 or
 3  from Professor Weissman; is that right?
 4            MR. TESLICKO:  Object to
 5       form.
 6            THE WITNESS:  I do rely on
 7       my expertise, but it has been
 8       informed by Professor Weissman's
 9       opinions.
10  BY MS. RHEE:
11       Q.    I see.  Okay.
12            But with respect to Google
13  source code, specifically --
14       A.    Mm-hmm.
15       Q.    -- you stopped working at
16  Google some time ago?
17       A.    Fifteen years ago, roughly.
18  Yeah.
19       Q.    Okay.  And even when you
20  were working at Google, you did not have
21  any reason or occasion to look at the
22  source code of these products, right?
```

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```
 1       A.    Mm-hmm.
 2       Q.    What you're talking about
 3  in terms of your familiarity is from
 4  your time at Google, right?
 5       A.    My personal familiarity,
 6  yes, it's from my time at Google.
 7       Q.    Okay.  And that was
 8  15 years ago?
 9       A.    That was, yes.  End of my
10  time there was 15 years ago.
11       Q.    Okay.  So going to this
12  page ending in 501.
13
```

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1   said.
2   You did rely on
3   Mr. Levitte's testimony about GCP but
4   not about DFP?
5   A.   No, not really. So --
6   Q.   Well, I just want to make
7   sure, because --
8   A.   Mm-hmm.
9   Q.   -- just reading back your
10 answer, "I relied a lot on what he was
11 telling me about GCP, that he was
12 confirming, basically, what I would
13 expect about GCP."
14   A.   So I misspoke.
15   Q.   I just want --
16   A.   That is absolutely fair.
17 You're absolutely fairly calling me out.
18 I misspoke. I relied.
19   I read his report and tried
20 to sort of verify. I have public
21 sources of information that tell me how
22 GCP functions.

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1   But here, I have a person
2   that actually lives that every day of
3   his life. This is his home.
4   And so I read his opinion
5   to find out if everything I know about
6   this is consistent. Is my understanding
7   of the space that he's describing
8   consistent with all the public
9   information and so on.
10   Or, for example, if he
11 brought up something that was completely
12 different than the public documentation,
13 my expectation, and so on, well, then
14 that's material.
15   Then I have to say either I
16 mistrust his opinion or -- you know, or,
17 basically, everything I know is wrong,
18 and I have to go and dig into it deeper.
19   But that hasn't happened.
20 Everything he's saying is, basically,
21 yeah, yes, yes, yes, yes, yes. Okay.
22 Let's move on.

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1   So there is nothing in his
2   deposition that changed my opinion, that
3   made me question or do additional
4   research. It was just, like, all right.
5   You know, put aside and move on.
6   Q.   So your answer just now
7   talked about a standard you applied in
8   deciding whether or not you would add a
9   source to your appendix, and you said,
10 oh, well, is it material?
11   Have I got that right?
12   MR. TESLICKO: Object to
13   form.
14   THE WITNESS: As long as
15   you don't use "material" in some
16   legal way that I don't know what
17   it means.
18 BY MS. RHEE:
19   Q.   I just really want to
20 understand what's the standard --
21   A.   What it means to me --
22   Q.   -- what's the standard you

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1   apply?
2   A.   Oh, perfect.
3   So when I do my work,
4   right, I come up -- at least my personal
5   process and the one that a large number
6   of the industry participants would agree
7   with, but some tend to break -- is I
8   want to arrive to my judgment
9   independently.
10   People have a tendency to
11 run into problems when they allow
12 themselves to be anchored.
13   So, for example, before I
14 start analyzing all of this, I don't
15 want anybody telling me how long they
16 think this should take, because as much
17 as I deeply believe it wouldn't impact
18 me, I'm also aware of all of the
19 research in human psychology that says
20 it would.
21   And while I would really
22 like to believe that I would be that one

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```
 1   exception, I don't need to take that
 2   chance.  So I want to do my work and my
 3   analysis before I hear what anybody else
 4   thinks about this.
 5              And then, obviously, using
 6   my experience, using access to any
 7   publicly available source, using the
 8   expertise, standard procedures, you
 9   know, and processes, what you would call
10   good, you know, governance of the stuff,
11   I come up with my estimate.
12              Once I have that, once I
13   understand where I stand and I can
14   explain why I stand there, I will look
15   for what other people think about this.
16              In this, let's call it,
17   second stage of the evaluation, I am
18   trying to see is there something that I
19   have possibly, and I'm going to say
20   materially, forgotten in my analysis.
21              You know, you don't know
22   what you don't know.  So at this point
```

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```
 1   in time, you are looking to other people
 2   to inform you did you completely miss
 3   the boat.
 4              I would be surprised if I
 5   did, but I would also be unprofessional
 6   and careless if I didn't do that
 7   evaluation.
 8              And at that stage, I start
 9   looking for things that have timelines.
10   What are their timelines?  Let's say I
11   encounter a document that has a timeline
12   that this is going to take 15 years.
13              I have to look at that
14   document seriously, because it is a
15   completely different order of magnitude
16   than my analysis.  I have to understand
17   what has informed their decision, where
18   is our disagreement.  And in some cases,
19   you find out -- that wasn't the case in
20   this case.
21              ██████████████████████
     ██  █████████████████████████████
```

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```
 1   ████████████████████████████████████
 2   ██ ██████████████  █████████████████
 3   ██ ███████████████████████  ████████
 4   ██ ████████████████████████████████
 5   ██ █████████████  ██████████████████
 6   ██ ████████████████████████████████████
 7   ██         ██████████████████████████
 8   ██ ████████████████████████████████
 9   ██ ███████████████████████████████
10   ██ ███████████████  ████████████████
11   ██ ███████████  ████████████████████
12   ██ ██████████████████████████████
13   ██ █████████████████████████████████
14   ██ ██████████████████████████
15   ██         ██████████████████████
16   ██ ████████████████████████████████
17   ██ █████████████████████████████
18   ██ ████████████████████████████████████
19          Frankly, I called my
20   counsel and said, like --
21          MR. TESLICKO:  Going to
22   stop you, not to disclose any
```

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```
 1   communications with counsel.
 2          THE WITNESS:  ██████████████
 3   ██  ███████████  ██████████████████
 4   ██ █████████████████████████████
 5   ██ ████████████████████████████████████
 6   ██ ██████████████████████████████
 7   ██ ████████████████████████████
 8   ██ ██████████████████████████████
 9   ██ ████
10   BY MS. RHEE:
11       Q.   Okay.  I want to unpack
12   what you just said.  There's a lot of
13   information here.
14          So in coming up with your
15   initial timelines and your opinion, what
16   you relied upon was your experience?
17       A.   Absolutely.
18       Q.   Access to publicly
19   available sources?
20       A.   Correct.
21       Q.   And your expertise?
22       A.   That is fair.
```

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1   And I also deployed the
2 standard processes and procedures used
3 in this type of an analysis. Yes.
4   Q.   Okay.
5   A.   Mm-hmm.
6   Q.   And that was the sum total
7 so that you could stay pristine, as you
8 put it, of what you actually relied upon
9 in order to come up with your timelines?
10   MR. TESLICKO: Object to
11   form.
12   THE WITNESS: Sorry.
13   At that point in time, you
14   call that first draft, right.
15 BY MS. RHEE:
16   Q.   Okay.
17   A.   So that is the first step
18 in the process. You kind of put your
19 stake into the ground and say, here is
20 what I think this should take.
21   Q.   Okay. And so did you put
22 all of those materials into your

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1 appendices?
2   MR. TESLICKO: Object to
3   form.
4   THE WITNESS: You have the
5   list of all of the publicly
6   available documents, yes?
7 BY MS. RHEE:
8   Q.   No. I do. I'm asking is
9 that --
10   A.   Yes.
11   Q.   -- everything you looked
12 up, you looked at, to come up with your
13 first draft, did you put in your
14 appendices?
15   MR. TESLICKO: Object to
16   form.
17   THE WITNESS: No. And
18   allow me to explain.
19 BY MS. RHEE:
20   Q.   Okay. Okay.
21   A.   When you're looking for
22 publicly available information, as you

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1 will know, Google will return you
2 millions of documents.
3   And you now sort through
4 those documents. Typically, you sort by
5 the validity, or let's call the
6 engineering level of trust in the
7 reporting source.
8   So I'm not going to look at
9 anything that BuzzFeed puts out. But
10 if, you know, IP Police putting it out,
11 that is important.
12   Then I will look at, you
13 know, maybe five or ten different
14 documents, and what you find, a lot of
15 times they overlap on, you know,
16 90 percent of the material.
17   I will quote you two or
18 three documents, the minimal subset,
19 that has all the information I relied
20 on, packaged in the form that I relied
21 on it.
22   But I may have seen another

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1 five documents that had this bit, or
2 that bit, that is already in these three
3 documents, that I just don't quote.
4   You know, I have read -- I
5 don't even know how to estimate --
6 probably -- or skimmed, in my whole
7 career, hundreds and thousands of
8 documents related to these things. I'm
9 relying on all of them in some way. I'm
10 not going to quote them all here because
11 they are, in my opinion, an element to
12 the case.
13   The parts that I quote are
14 the sort of the minimal subset. Like,
15 what is the highest-quality minimal
16 subset that contains everything I have
17 relied on.
18   So everything I relied on
19 has to be in there, but it can also be
20 seen in some other documents, because --
21   Q.   Well, in documents you saw.
22   A.   Correct.

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```
 1      Q.    Okay.
 2      A.    Because, as you see, in our
 3  field people tend to cut and paste,
 4  copy, and especially today, you have a
 5  whole ton of AI-generated documents.
 6           You know, if you're going
 7  to quote all of them, like, that's going
 8  to be a lot of paper wasted.
 9      Q.    Okay.  Then in the second
10  stage --
11      A.    Mm-hmm.
12      Q.    -- of your evaluation --
13      A.    Mm-hmm.
14      Q.    -- in finalizing your
15  opinion -- is that fair to say?
16      A.    Yes.
17      Q.    In finalizing your opinion,
18  that's when you look for material.  And
19  I think your testimony was that you may
20  have materially forgotten in your
21  analysis; is that right?
22           MR. TESLICKO:  Object to
```

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```
 1      form.
 2           THE WITNESS:  No.  No.  I
 3      think --
 4  BY MS. RHEE:
 5      Q.    Well, I think what you said
 6  was, "I'm trying to see if there's
 7  something that I have possibly, and I'm
 8  going to say materially, forgotten in my
 9  analysis."
10      A.    Mm-hmm.  That is correct.
11           That is the verification
12  stage.  And so in that stage, I actually
13  start looking at other people's
14  timelines.  ███████████████████
███ ██████████████████████
16           But as you can probably
17  understand, you can't find -- if you go
18  and do the public search and say how
19  long would it take to divest the DFP,
20  even if you say -- you know, among
21  engineers, if you were to say how long
22  would it take to migrate DFP to
```

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```
 1  different known proprietary environment,
 2  let's search for that, you're not going
 3  to find any documents with the time
 4  estimate for that.
 5           That type of work is
 6  typically done by the company that owns
 7  the product internally.  It is not
 8  exactly available online.
 9           And so, you know, that kind
10  of information I'm hoping I'm going to
11  find somewhere.  But I'm not going to
12  search for it online because I know it's
13  not available online.
14           And so in my Stage II, I am
15  trying to -- call it the testing stage.
16  I'm trying to test my work and -- and
17  look at it as if it's somebody else's
18  work and say, did the person who did
19  this work, did they do everything that
20  needed to be done?  Did they encounter
21  everything?  Did they do due diligence?
22           And so this is my testing
```

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```
 1  due diligence stage of am I doing the
 2  work at a level that I believe I should
 3  be.
 4      Q.    Okay.  And in this stage --
 5      A.    Mm-hmm.
 6      Q.    -- it looks like you
 7  roughly sorted the documents to be
 8  documents, as you put it, that
 9  ███████████████████████████?
10           MR. TESLICKO:  Object
11      to --
12           THE WITNESS:  No.
13           MR. TESLICKO:  Object to
14      form.
15  BY MS. RHEE:
16      Q.    I'm -- but you testified,
17  ████████████████████████████████
██ ███████████████████████████
██ ██████████████████████████
20  right?
21      A.    That is correct.  I was --
22      Q.    All right.  So for that
```

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```
 1   category set of documents, did you put
 2   each and every one of those documents in
 3   your appendices?
 4        A.    No.
 5        Q.    Okay.
 6        A.    And I wasn't -- I don't
 7   even know how I would issue a request.
 8                         ███████████████
     █  ██████████████████████████████████
     █  ████████████
11               So, no, that was never
12   issued.
13        Q.    Well, but I --
14        A.    Mm-hmm.
15        Q.    That's a different issue.
16   I'm not asking for all the universe of
17   hypothetical documents that are out
18   there.
19        A.    Mm-hmm.
20        Q.    I'm saying, of the
21   documents, as you testified to --
22        A.    Mm-hmm.
```

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```
 1        Q.    -- that you looked at --
 2        A.    Mm-hmm.
 3        Q.    █████████████████████████
     █  ██████████████████
 5        A.    Mm-hmm.
 6        Q.    █████████████████████████
     █  ████████████████████████
 8        A.    Mm-hmm.
 9        Q.    -- did you cite each and
10   every one of those documents in your
11   appendices?
12               MR. TESLICKO:  Object to
13        form.
14               THE WITNESS:  No.
15   BY MS. RHEE:
16        Q.    Okay.
17        A.    There were some -- I've
18   cited the ones that were, let's call,
19   the most precise.
20               There were some documents
21   that, you know, arguably, you could say,
22   well, you know, how can you even make
```

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```
 1   sense of this.  And as an engineer, I
 2   can.
 3               But I also understand that
 4   people outside of high-tech would just
 5   sort of shake their heads and -- and not
 6   know what to make of them.  And so those
 7   I didn't cite because I didn't think
 8   they would be helpful.
 9               But -- but, yeah, during
10   that stage, that's what I do.
11        Q.    Okay.  That's helpful.
12               And then there was a
13   category set of documents, and I believe
14   your testimony is:  ███████████████████
     █  ████████████████████████  █████████
     █  ██████████████████████████████
     █  ████████████████████████████████████
     █  ████████
19        A.    I'm sorry --
20               MR. TESLICKO:  Object to
21        form.
22               THE WITNESS:  That --
```

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```
 1        what -- what are we talking
 2        about there?
 3   BY MS. RHEE:
 4        Q.    Well, this is -- this is
 5   your testimony --
 6        A.    Yes.  Yes.
 7        Q.    -- and you talked about
 8   looking at some documents, ██████████████
     █  ████████ -- I'm just going to read you
10   your testimony.
11               ████████████████████████████
     █  ██████████████████  ██████████████████
     █  ██████████████████  ████████████████
     █  ████████████████████████████
     █  ██████████████████████████
     █  █████████████████
17               MR. TESLICKO:  Object to
18        form.
19               THE WITNESS:  That is kind
20        of hard to unpack.
21               And I -- I want to answer
22        your question and say I think --
```

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1 and that's my fault because I	1 avoid to do this step of due
2 just talk a lot.	2 diligence, because I'm
3 So there are two aspects	3 testifying here and I'm doing
4 over here.	4 work for the plaintiffs as a
5 I say that in Stage II, it	5 professional, and there is
6 is my job to do due diligence	6 certain code of behavior that
7 and look for any information	7 describes that.
8 that may point out there is	8 BY MS. RHEE:
9 something I have forgotten.	9 Q. Okay. That's very helpful.
10 During that stage is the	10 A. Mm-hmm.
11 time when I look at all of the	11 Q. So I want to understand.
12 Google documents. ▮▮▮▮▮▮	12 In this process, the
13 ▮▮▮▮▮▮▮▮▮▮▮▮	13 second-stage --
▮▮▮▮▮▮▮▮▮▮	14 A. The second stage, yeah.
▮▮▮▮▮▮▮▮▮▮ And	15 Q. -- process, you acknowledge
16 you know, I'm happy hiking	16 you did find some documents ▮▮▮▮
17 somewhere else.	▮▮▮▮▮▮▮▮▮▮▮▮
18 But in that process, ▮	▮▮▮▮▮
▮▮▮▮▮▮▮▮▮▮	19 A. Yes. Correct.
▮▮▮▮▮▮, and then I try	20 Q. Okay. Now --
21 to understand it.	21 A. And this would be one of
22 Because it could be like	22 those documents that you referred to.

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1 what has happened, ▮▮▮▮▮▮	1 Q. I totally get it.
▮▮▮▮▮▮▮▮▮▮	2 A. Mm-hmm.
▮▮▮▮▮▮▮▮▮	3 Q. I'm asking, for all of
▮▮▮▮▮▮▮▮▮▮	4 those documents --
▮▮▮▮▮▮▮	5 A. Mm-hmm.
▮▮▮▮▮	6 Q. ▮▮▮▮▮▮▮▮▮▮
▮▮▮▮▮▮▮▮	▮▮▮▮▮▮▮▮▮▮▮▮
▮▮▮▮▮▮▮▮	▮▮▮▮▮▮
▮▮▮▮▮▮▮▮	9 A. Mm-hmm.
▮▮▮▮▮▮▮▮	10 Q. -- did you include all of
▮▮▮▮▮▮	11 those documents in your appendices?
▮▮▮▮▮	12 A. I think so. I think so. I
▮▮▮▮▮▮▮▮	13 think we did.
▮▮▮▮▮▮▮	14 And especially -- like, if
▮▮▮▮▮▮	15 we referred to the document, I think
▮▮▮▮▮▮▮	16 so -- yeah. Sorry.
▮▮▮▮▮	17 If we referred to the
19 I would like to think that	18 document, if I relied on the document,
20 as an expert in this field, that	19 definitely yes.
21 wouldn't happen. And it didn't.	20 Q. Yeah. But that's not my
22 But I cannot -- I should not	21 question.
	22 ▮▮▮▮▮▮▮ ▮▮

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```
 1   clearly saw in the way that you --
 2        A.    Mm-hmm.
 3        Q.    -- answered the question,
 4   it seems like it was more than one
 5   document.  You clearly saw, as you put
 6   it, some documents where --
 7        A.    Mm-hmm.
 8        Q.    -- ███████████████████████
 ██████████████████████████████████████
 ██████████████
11             I am now asking you --
12        A.    Mm-hmm.
13        Q.    -- for that number of
14   unknown documents -- or unknown number
15   of documents ███████████████████████
 ██████████████████████████████.
17             Did you put them down, all
18   of them down, in one of your appendices?
19        A.    I --
20             MR. TESLICKO:  Object to
21        form.
22             ██████████████  ██████████
```

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```
 1        put most of them down -- or I
 2        put most of them down.
 3             But I would be hesitant to
 4        tell you that I put all of them
 5        down.
 6             However, if there is a
 7        document that I haven't put down
 8        ███████████████████████████, I
 9        would be very happy to look at
10        it right now and analyze it and
11        tell you why.
12             You know, I don't think
13        there is a document like that.
14        But if there is, I would be very
15        happy to, you know, look through
16        it and tell you why I didn't
17        rely on it.
18   BY MS. RHEE:
19        Q.    Okay.
20             MS. RHEE:  Is it okay if
21        we take another break, because
22        I've had a lot of water.
```

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```
 1             THE VIDEOGRAPHER:  Off the
 2        record at 11:35.
 3             (Short break.)
 4             THE VIDEOGRAPHER:  On the
 5        record at 11:48.
 6   BY MS. RHEE:
 7        Q.    During all of these
 8   breaks --
 9        A.    Mm-hmm.
10        Q.    -- I never want to actually
11   know what, if anything, was said by
12   counsel.  So I -- before Mr. Teslicko
13   jumps in and gives his warning like a
14   broken record, I just want to be very
15   clear, that is not what I'm asking.
16        A.    Mm-hmm.  Mm-hmm.
17        Q.    But just for the record,
18   want to be assured that during all of
19   the breaks, are you talking about the
20   substance of your answers?
21        A.    No.  We are talking about
22   hiking.
```

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```
 1        Q.    Well, even there, I don't
 2   want to know what -- what, in fact,
 3   you're talking about, other than just
 4   making sure that the substance of your
 5   answers on the record are not the topic
 6   of discussion.
 7        A.    But before I answer your
 8   question, it was raised that I have
 9   confused the two names.
10             I told you, I'm really
11   terrible with names.  And if you look at
12   my responses to your questions, I'm
13   talking constantly about the GCP guy and
14   his response.  And I thought that his
15   name was George Levitte.
16             And apparently that is not
17   his name.  His name is something else.
18   Sam?
19        Q.    Okay.
20        A.    Let's go with Sam.
21             And so when you were asking
22   all of those questions, I was thinking
```

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```
 1   VP guy?
 2        Q.    Okay.  That's --
 3        A.    All right?
 4        Q.    -- also on the product
 5   team.
 6        A.    On the product team.  Yes.
 7   I do -- okay.  Yeah.  I do remember
 8   his -- I did read his deposition.  Yes.
 9        Q.    Okay.  You did read his
10   deposition?
11        A.    Yes.  Mm-hmm.
12        Q.    Okay.  And if you read his
13   deposition, were you aware that he also
14   testified about this document?
15        A.    Do I remember in detail
16   that he talked about this document?  No.
17        Q.    How about just even
18   generally?
19              MR. TESLICKO:  Object to
20        form.
21              THE WITNESS:  No.  I --
22        when I'm reading depositions,
```

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```
 1        I -- I don't go and
 2        cross-reference all the
 3        documents that people are
 4        talking about.
 5              There are things through
 6        the deposition -- well, I'm
 7        reading them for two reasons.
 8              First of all, to figure
 9        out what is -- what is a
10        deposition.
11              But, second -- but --
12   BY MS. RHEE:
13        Q.    Fair.
14        A.    -- second, I'm kind of
15   looking for relevant information as it
16   pertains to my decisions.
17              So, for example, in case
18   of -- and I'm not going to ascribe it to
19   Mr. Craycroft because I could be wrong
20   about the name.  But there is a VP of
21   ads that basically estimates the size of
22   his organization.  And so that bit of
```

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```
 1   information I remember because it is
 2   relevant.
 3   [REDACTED]
22              MR. TESLICKO:  Object to
```

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```
 1        form.
 2   [REDACTED]
 7   BY MS. RHEE:
 8        Q.    Are you aware of an
 9   individual by the name of Glenn
10   Berntson?
11        A.    I have read Mr. Berntson's
12   deposition.
13        Q.    Okay.  Yeah.
14        A.    I am -- there is a reason
15   why I remember Glenn's deposition.  Yes.
16        Q.    Okay.  So you also know
17   that he is on the product team?
18        A.    He is on the product team,
19   New York office, manager.  Maybe
20   director.  But manager.
21        Q.    And are you aware that he
22   also testified about this document?
```

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```
1         A.    I am -- I don't recall the
2    part of his testimony as it pertains to
3    this document.
4    ████   ████   █████████
█    ██████████████████████████
█    ███████████████████████████████
█    ███████████████████████████████
█    ████████████████████████████
█    ████████████████████████
█    ████████████
11              MR. TESLICKO:  Object to
12        form.
13         ████████   ██████████
█    █████████████████████████████
█    █████████████████████████████
█    █████████████████████████████
█    ██████████
█    ████████████████
█    ██████████████████
█    ███████████████████████████
█    ████████████████████████
█    ██████████████████████████
```

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```
1    ███████████████████████████████
█    ███████████████████████████
█    ██████████████████████  ███
█    ██████████████████████████
█    ███████████████████████
█    █████
█    ████████████████████
█    ██████████████████████████
█    ██████████████████████████████
█    ████████████████████████████
█    █████████████████
12   BY MS. RHEE:
13         Q.    Okay.  Are you familiar
14   with an individual by the name of Noam
15   Wolf?
16         A.    I have heard the name Noam
17   Wolf as well.
18              If -- if you could, again,
19   put him in context, that would be
20   fantastic.
21         Q.    Also an engineer on the
22   product team.
```

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```
1         A.    On the product team.  All
2    right.  All right.
3         Q.    Do you remember reading his
4    testimony?
5         A.    Sitting here today, I don't
6    remember anything specific about his
7    testimony.  Unlike Mr. Berntson --
8    Glenn, like, that one had a couple
9    things that pop up at me.
10             But, no, I cannot recall
11   specific parts of his testimony that
12   would stand out to me.
13        Q.    Okay.  So, again, sitting
14   here, you don't recall or know whether
15   or not he also was shown this document
16   and testified about it?
17             MR. TESLICKO:  Object to
18        form.
19             THE WITNESS:  That is fair
20        to say.  Yes.
21   BY MS. RHEE:
22        Q.    Okay.  ████████████████
```

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```
1    █████████████████████████████████
█    ████████████████████████
█    █████████████████████████████
█    ███████████████████████
█    ████   ████████
█    ████  ███████████████████████
█    █████████████
8              MR. TESLICKO:  Object to
9         form.
10        ████████   ████████
█    ██████████████████████████████
█    █████████████████████
█    ████████████████████████
█    █████████
█    ████████████████████████
█    ██████████████████████████
█    █████████████████████████
█    ████████████████████████
█    ██████████
█    ██████████████████████████
█    ████████████████████████████
█    ███████████████████████
```

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1   MR. TESLICKO: Object to
2   form.
3   THE WITNESS: I have not
4   analyzed the user consent to
5   require user data.
6   I am -- I'll admit I'm
7   slightly confused as how -- who
8   is the user that you're talking
9   about in this case and how it
10   applies to the Ad Exchange.
11   And I'm not -- if you can
12   clear up the context for me, I
13   would be able to answer your
14   question a little bit better,
15   maybe.
16 BY MS. RHEE:
17   Q.   Okay. But just sitting
18 here today, you don't know about the
19 role, if any, of a user in ad serving
20 process?
21   MR. TESLICKO: Object to
22   form.

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1   THE WITNESS: No. I -- I
2   would say that a "user" is a
3   very loaded term here -- maybe
4   loaded is a bad word.
5   But it can have multiple
6   meanings.
7   When you say user, do you
8   mean an advertiser? Do you mean
9   a publisher? Who do you mean?
10 BY MS. RHEE:
11   Q.   Okay. But you haven't come
12 across the use of the term "user" in
13 stat materials?
14   MR. TESLICKO: Object to
15   form.
16   THE WITNESS: Sorry.
17   I have come across the use
18   of that term, and I have used it
19   -- I have found it in different
20   contexts.
21   And so in different
22   contexts, it was simply

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1   referring to different user.
2   And -- and that's why I'm asking
3   you for qualification -- for --
4   sorry -- for clarification,
5   because it can mean a publisher.
6   You could reasonably say a
7   publisher is a user of -- of
8   DFP.
9 BY MS. RHEE:
10   Q.   Okay.
11   A.   But you could also
12 reasonably say, no, that's not a user;
13 it's the ad agency that the publisher is
14 employing that is the user of DFP.
15   They are certainly not
16 users of the -- of the buyer-side,
17 right. So there you have advertisers,
18 and they are the users.
19   And, unfortunately, the
20 term "user" means different things in
21 different contexts.
22   Q.   Okay. You rely upon

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1 Dr. Weissman's analysis, I think, as you
2 put it, the analysis of the source code
3 and data flow in AdX and DFP; is that
4 right?
5   A.   Yes. That is correct.
6   Q.   Okay. What data flow do
7 you believe Dr. Weissman reviewed in the
8 source code?
9   A.   So, genuinely, I would
10 refer you to Dr. Weissman's document on
11 this because he kind of defines the
12 details.
13   But, for me, what was
14 really important in his analysis were
15 two things.
16   I've asked for specific
17 information about the code base to
18 verify that it still keeps the same
19 characteristics that it had when I last
20 worked in it, and that information was
21 provided to me.
22   And --

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```
 1        Q.    How was that provided to
 2   you when you didn't look at the source
 3   code yourself?
 4        A.    So it was provided to me --
 5   I had access to Dr. Weissman's draft
 6   report before the first round of our
 7   report submittal.
 8             So don't quote me on the
 9   date, but July.
10             MR. TESLICKO:  Instruct
11        you not to discuss drafts
12        because they are carved out by
13        the expert stipulation.
14   BY MS. RHEE:
15        Q.    Are you going to follow
16   counsel's instruction not to answer that
17   question?
18        A.    Yeah.
19        Q.    Okay.
20        A.    I'm sorry.  But yeah.
21        Q.    I had to ask.
22             Okay.
```

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```
 1        A.    You're doing your job.
 2        Q.    I just want to make clear,
 3   since you did not look at the source
 4   code yourself, did you have access to
 5   anything that Dr. Weissman did that is
 6   not set forth in his final reports?
 7        A.    No.  I have not relied on
 8   anything other than that -- other than
 9   Dr. Weissman's analysis and his report.
10        Q.    Okay.  So insofar as you
11   make reference to relying upon
12   Dr. Weissman's source code analysis --
13        A.    Mm-hmm.
14        Q.    -- that analysis is what
15   Dr. Weissman sets out in his report and
16   in his source code appendix; is that
17   right?
18        A.    That is correct.
19             MR. TESLICKO:  Object to
20        form.
21   BY MS. RHEE:
22        Q.    Okay.  And that's -- and
```

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```
 1   that's the total?  There's nothing else?
 2        A.    I have also reviewed
 3   Dr. Weissman's reports themselves, in
 4   particular, portions that discuss what
 5   we have referred to -- that could be
 6   relevant to the things that we are
 7   talking about, Stage I and Stage II of
 8   DFP divestiture, because in those stages
 9   the -- he's discussing the ability to
10   create APIs and the ability to cut out a
11   code and open-source that portion of the
12   code.
13             And I'm relying on his
14   expert opinion that the code is -- it is
15   possible to do those things.
16        Q.    Okay.  In particular, you
17   seem to spend some time looking at what
18   you referred to as Dr. Weissman's source
19   code statistics; is that right?
20        A.    That is correct.
21        Q.    Okay.  And what do you
22   understand Dr. Weissman to have done to
```

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```
 1   put together his source code metrics
 2   that he sets out in his source code
 3   appendix?
 4        A.    So I have seen some of the
 5   statements that Dr. Weissman lists.  He
 6   happens to use SQL to obtain this
 7   information.
 8             For me, there are specific
 9   things that I have asked for about the
10   code base, and I have obtained the
11   information that I have asked for.
12        Q.    Okay.  Where do you set out
13   what is the information that you asked
14   for and the information you obtained?
15        A.    Oh, in the table where I
16   list the source code information.
17   That's the information that I asked for.
18   That's the information that I obtained.
19        Q.    I see.  So what you asked
20   for were these source code metrics?
21        A.    That is correct.  Yes.
22        Q.    Okay.  I see.  I see.
```

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1   So what specifically did
2 you ask for?
3   MR. TESLICKO: I'm just
4   going to instruct you not to
5   disclose the substance of any
6   communications with Keystone or
7   with counsel.
8   THE WITNESS: Mm-hmm.
9   So when I have worked at
10   Google, I had an insight, and I
11   was, you know, inside Google3,
12   and I looked at some of the
13   stuff.
14   And so what I'm looking
15   for over here is, is the code
16   base still what I would consider
17   clean and healthy code base.
18   And there are a couple of things
19   that can tell you that.
20   Not a single line in that
21   table by itself necessarily
22   means much. But, in general,

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1 you're looking at -- and, again,
2 I make predictions about the
3 code base before I get the
4 confirmation.
5   So I would expect AdX to,
6 for example, be smaller than all
7 of the utilities.
8   Is that -- is that true?
9 Yes, it is.
10   I would expect DFP, to a
11 little bit, be -- be a little
12 bit bigger than AdX but, again,
13 smaller than utilities. Is that
14 true? Yes.
15   So those kinds of things
16 are consistent with my
17 expectations.
18   But here are the other
19 things that I want to see.
20 Let's say you are talking about,
21 as we are here, about C++ code
22 base, and you find out that the

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1 C++ code base has, I don't know,
2 tens of thousands of files and
3 they are all smaller than 25 to
4 30 lines of code. That would
5 give me a pause.
6   What's going here. Like,
7 why would anybody do this. And
8 I would question what kind of
9 code base I'm dealing with.
10   So these are sort of --
11 consider them health checks,
12 right.
13   If you were to go to a
14 doctor and they do a blood test
15 and they look at the number of
16 parameters, you look at it and
17 say is this person healthy, and
18 you basically make a decision
19 that, yeah, this -- this is a
20 healthy person.
21   Now, that really does not
22 mean, necessarily, that the

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1   person is not suffering from
2   something you don't see.
3   But nine times out --
4   actually, I would say 99 times
5   out of 100, it gives you a
6   really clear insight in what
7   you're dealing with.
8   And that is kind of -- the
9   simple statistics can tell you
10   how -- how clean is this code
11   base.
12   And for me, it confirmed
13   that Google has continued with
14   their practice of being diligent
15   and professional and strict
16   about what they allow in and out
17   of the code base.
18 BY MS. RHEE:
19   Q.   Okay. We're going to go to
20 the details of this --
21   A.   Mm-hmm.
22   Q.   -- table in a minute but --

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1   A.   All good.
2   Q.   -- but based on your
3   answer, I have some follow-ups for you.
4   A.   Sure.
5   Q.   You likened this to a
6   health check.
7   A.   I just did.
8   Q.   Okay. Do you have either a
9   textbook citation, a manual citation, an
10   industry citation that lays out the kind
11   of health check methodology that you
12   just walked us through --
13   MR. TESLICKO: Objection.
14   BY MS. RHEE:
15   Q.   -- where, you know,
16   counting the number of files and lines
17   of code is a way to do this kind of
18   health check, where, as you put it,
19   nine -- nine times out of ten it tells
20   you helpful information about the
21   person's health?
22   MR. TESLICKO: Object to

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1   form.
2   THE WITNESS: Understood.
3   So you can find tremendous
4   number of discussions about this
5   topic in particular lines of
6   code.
7   I personally have totally
8   objected when people have used
9   lines of code in contexts that I
10   felt were completely and utterly
11   inappropriate for.
12   And you could also make an
13   argument that, well, you're
14   talking about roughly
15   one-and-a-half-million lines of
16   code for AdX. Can all of that
17   code be rearranged so that the
18   number of lines changes to be
19   something a lot smaller?
20   Absolutely.
21   You could rewrite all of
22   the code probably

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1   programatically so that the
2   number of lines of code will be
3   exactly the same as the number
4   of -- number of files you're
5   dealing with.
6   Because lines don't mean
7   anything to the computers. They
8   mean something to the
9   programmers.
10   And so people can, and
11   they do, make a very reasonable
12   argument by saying, so lines of
13   code are meaningless.
14   BY MS. RHEE:
15   Q.   What -- do you cite to any
16   of that literature?
17   A.   No, I don't.
18   Q.   Okay.
19   A.   Because it's -- it's an
20   ongoing discussion. And I think it's
21   going to be -- I don't think it's ever
22   going to be resolved. It is just one of

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1   those philosophical topics where lines
2   of code -- it depends on what you use
3   the metric for.
4   You will find my work
5   strongly objecting to industry
6   benchmarks in performance testing.
7   And if you take it out of
8   context, you would say, all right, so
9   you're against benchmarks. Why did you
10   then spend all of your time at Google
11   wasting their money writing benchmarks.
12   And, you know, it would feel that way.
13   I object to what people use
14   benchmarks for. It -- benchmarks give
15   you very useful information.
16   So in case of Google,
17   benchmarks enabled my development
18   partners to quickly find out. I write
19   something that allows them early in the
20   morning to look and say, did I make a
21   giant performance blunder yesterday
22   without realizing I was doing that.

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1   That was the purpose of the
2 benchmark. It was incredibly valuable.
3   Now, if you take that
4 benchmark and you say, and this
5 benchmark proves that the code for
6 rightly is far better performed than the
7 code for something else, I'm going to
8 object to that. It wasn't written for
9 that. That is not the purpose of that
10 benchmark.
11   So in the discussion of
12 lines of code, they can be both very
13 useful and useless.
14   Okay. If a manager uses
15 lines of code to promote people, like, I
16 get hives. That is such a stupid
17 statistic to use in that context. So if
18 you use lines of code in that context,
19 yeah, they are -- they are terrible.
20   But if you use lines of
21 code and say, these are reasonable lines
22 of code written by engineers who were

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1 not trying to get promoted by just
2 writing more lines and -- and roughly
3 describe the size of the project, then
4 that actually makes sense.
5   Q.   I'm asking --
6   A.   Mm-hmm.
7   Q.   -- insofar as you think in
8 this context --
9   A.   Mmhmm.
10   Q.   -- i.e., assessing
11 timelines and complexity --
12   A.   Mm-hmm.
13   Q.   -- do you have any
14 references to literature anywhere that
15 says, looking at these kind of simple
16 statistics --
17   A.   Mm-hmm.
18   Q.   -- is actually, as you put
19 it, a good health check?
20   MR. TESLICKO: Object to
21   form.
22   THE WITNESS: So I will

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1 answer your question "no."
2   But I'm also not
3 referencing GAM on the standards
4 of C++ language. It's just C++,
5 you know, so --
6 BY MS. RHEE:
7   Q.   I know.
8   But I'm asking as a
9 methodological matter, insofar as you're
10 positing that this is a sound means --
11   A.   Mm-hmm.
12   Q.   -- to do a health check,
13 can you cite to anything that supports
14 that proposition?
15   MR. TESLICKO: Object to
16   form.
17   THE WITNESS: I am certain
18   I can find those references for
19   you and would be happy to
20   provide them for you.
21 BY MS. RHEE:
22   Q.   Okay. But you don't have

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1 it right now in any of your appendices?
2   A.   No. I really didn't think
3 we would be discussing such basic things
4 that kind of a general agreement.
5   As I said, I also don't
6 cite anything on the history and
7 development of C++.
8   Those things are just, you
9 know, building blocks. Let's call them
10 building blocks of the whole process,
11 so...
12   Q.   Okay. Okay.
13   A.   But if you would like me
14 to, I will happily provide you with, you
15 know, references for all of those
16 things.
17   Q.   Okay. Thank you.
18   MS. RHEE: Is now a good
19   time to take a lunch break?
20   MR. TESLICKO: Sure.
21   Let's go off the record.
22   THE VIDEOGRAPHER: Off the

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```
 1          record at 12:44.
 2                      -  -  -
 3                (Whereupon, a luncheon
 4          recess was taken.)
 5                      -  -  -
 6    A F T E R N O O N   P R O C E E D I N G S
 7                      -  -  -
 8                THE VIDEOGRAPHER:  On the
 9          record at 1:23.
10                      -  -  -
11             CONTINUED EXAMINATION
12                      -  -  -
13    BY MS. RHEE:
14        Q.    Okay.  So we left off
15    talking about this source code metric
16    table.
17             Do you recall?
18        A.    Yes, I do recall.
19        Q.    Okay.  So why don't we
20    actually look at the -- no pun
21    intended -- the source.
22        A.    Mm-hmm.
```

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```
 1        Q.    I'm going to get what I
 2    hope is the Weissman Table 2, from his
 3    source code appendix.
 4             MS. RHEE:  Thank you so
 5          much, Anita.
 6             (Document marked for
 7          identification as Bjedov
 8          Exhibit 3.)
 9             THE WITNESS:  Am I allowed
10          to start looking at it?
11    BY MS. RHEE:
12        Q.    Oh, yes, of course.
13        A.    I wasn't sure.
14        Q.    Of course.
15             What I'm directing your
16    attention to, because I think you
17    replicate it --
18        A.    Mm-hmm.
19        Q.    -- in your own report, is
20    this Table 2 called "Source Code
21    Metrics."
22             Do you see that?
```

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```
 1        A.    Mm-hmm.  I do.
 2        Q.    Okay.  And this is a
 3    running of a tool to basically do counts
 4    of each of these items, right?
 5        A.    Yeah.  You can -- so
 6    Professor Weissman used the tools that
 7    he prefers.
 8             I -- I would get the same
 9    numbers using standard Unix commands,
10    provided that the repo is available
11    through -- through Unix, which I think
12    it is.
13        Q.    It's a pretty simple -- you
14    know, a tool or piece of code just to
15    count.
16        A.    Yeah.  You count and grip,
17    and -- yeah.  But sure.
18        Q.    Okay.  And then what he's
19    counting are the number of files --
20        A.    Mm-hmm.
21        Q.    -- classes, functions, and
22    code lines for what he puts in these
```

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```
 1    columns: Supermixer, BOW, AdX, and GFP.
 2    Fair?
 3        A.    That is -- that is correct.
 4    Yeah.
 5        Q.    Okay.  And you see the
 6    count for this column titled "AdX" to be
 7    the complete count of source code
 8    associated with AdX?
 9             MR. TESLICKO:  Object to
10          form.
11             THE WITNESS:  I would say
12          absolutely not.
13             This is really more of
14          a -- you know, let's call it --
15          let's call it server-side stuff.
16             So I would not expect the
17          front-end code to be written in
18          C++.
19             And I would not expect to
20          find it in this directory.  It
21          would be odd to do that.
22    BY MS. RHEE:
```

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```
 1   pleasure of interacting with.
 2           From the ability to just
 3   list files, which files are in this
 4   directory, ls, to the things like what
 5   is the name of the kernel that -- that
 6   you are running.  You name ls-a.
 7           All of those commands, they
 8   are a part of operating system, but they
 9   are -- let's say they are not the core
10   part.  They are not the kernel, but they
11   are called utilities.
12           And so I'm talking about
13   utilities of these things that you
14   really need in order to provide the
15   service you're providing.  But they are
16   not necessarily the part of your core.
17           So in case of AdX, you will
18   say it's an exchange.  Its core part is
19   the exchange.
20           But, you know, it may
21   realize -- so, for example, you can
22   utilize in BOW for a lot of things.  BOW
```

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```
 1   is those utilities that basically
 2   removes some responsibility from AdX to
 3   allow AdX to be lean, mean, and operate
 4   cleanly.  But AdX can call it and say,
 5   hey, give me this.
 6           So a very, I would say,
 7   advanced or -- the right way to develop
 8   computer systems.
 9       Q.   Okay.  But the upshot is, I
10   think, based on your earlier
11   testimony --
12       A.   Mm-hmm.  Mm-hmm.
13       Q.   -- is it's your opinion
14   that BOW and Supermixer need to be
15   divested, along with what you're calling
16   core AdX --
17       A.   Mm-hmm.
18       Q.   -- in order to provide the
19   functionality that an acquirer would
20   expect.
21           Is that -- have I got your
22   testimony right?
```

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```
 1       A.   Very close.
 2           I would say that there are
 3   certainly functions inside BOW and
 4   inside Supermixer.  Supermixer is
 5   probably, again, most likely its own
 6   product.  But certainly inside BOW, that
 7   the buyer would have to get the copy of.
 8           All of them, I cannot tell
 9   you that, but certainly a fair number of
10   it.
11           Because as you will see,
12   BOW being the -- what's called the
13   utility-type part of the code base, is
14   larger than the rest of the stuff.
15           And so there could be parts
16   in BOW that apply just to AdX.  There
17   could be parts that apply to just the
18   DFP.  There could be parts in BOW that
19   support Supermixer itself.  And there
20   could be some parts that are used by all
21   three.
22           But there could be other
```

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```
 1   parts they use by one or two or -- there
 2   are probably even parts that are not
 3   used by anybody and haven't been removed
 4   from the code base for either historical
 5   or -- or, actually, strategic reasons.
 6           So parts of it would have
 7   to certainly be provided to the
 8   purchaser to make AdX work.
 9           The other parts, Google
10   could reasonably say, well, this is not
11   necessary to make AdX work, and,
12   therefore, we are not going to be
13   providing it.
14       Q.   Okay.  So would you
15   consider BOW and Supermixer to be a
16   dependency of AdX and DFP?
17       A.   I would not use the term
18   "dependency."
19           I would say that AdX relies
20   on them, because they are really more --
21   they are kind of on the same level, if
22   that makes sense.
```

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```
 1              And so they --
 2      Q.    It doesn't make sense.
 3      A.    All right.
 4      Q.    This is why I'm asking the
 5  question, because -- I mean, let's just
 6  level set.
 7              You are familiar with,
 8  because you use it in your own report --
 9      A.    Mm-hmm.
10      Q.    -- and certainly
11  Dr. Weissman uses it in his, and you
12  rely upon --
13      A.    Mm-hmm.
14      Q.    -- this notion of a
15  dependency, right?
16      A.    Absolutely.  Yes.
17      Q.    Okay.  And how long a
18  divestiture takes or your step of
19  technical decoupling --
20      A.    Mm-hmm.
21      Q.    -- depends on both the
22  number of dependencies and the
```

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```
 1  complexity of those dependencies, right?
 2              MR. TESLICKO:  Object to
 3          form.
 4              THE WITNESS:  Not exactly.
 5          That's a very -- because, again,
 6          the parallelization comes to the
 7          issue.
 8              In the strictest technical
 9          term, you could really say that
10          all four of these most likely
11          depend on each other and call
12          each other.
13              Now, do they call
14          everything inside BOW?  No --
15  BY MS. RHEE:
16      Q.    No.  Understood --
17      A.    But some aspects of it, for
18  sure.
19      Q.    Right.  But that's the
20  reason why I'm asking.
21              What's the difference
22  between how Dr. Weissman refers to, as a
```

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```
 1  dependency, and you refer to a
 2  dependency, and what you're describing
 3  here for Supermixer and BOW, which you
 4  do not call a dependency --
 5      A.    Mm-hmm.
 6      Q.    -- but instead call a
 7  related utility system?
 8      A.    So in my example, when I
 9  was describing UNIX, I wouldn't say that
10  UNIX kernel depends on utilities.  It's
11  just they -- they are -- there is
12  kernel, there is utilities, but they are
13  one, right?
14              And even though you could
15  separate them by code base, you compile
16  them differently and separately and so
17  on, they -- from the computer science
18  standpoint and from the practitioner
19  standpoint, you would never -- I don't
20  think any engineer would say, oh, when I
21  say UNIX, I mean UNIX kernel, and I
22  think UNIX Utilities, right, is
```

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```
 1  dependencies.
 2              We just say UNIX.  It's the
 3  product.  It's the kernel.  It contains
 4  all of the utilities.  We use it as one.
 5      Q.    Yeah.  But when we're
 6  talking about UNIX here, we're talking
 7  about internal Google infrastructure and
 8  its product --
 9      A.    Product.
10      Q.    -- source code.
11      A.    Mm-hmm.
12      Q.    So here I just want to be
13  clear --
14      A.    Mm-hmm.
15      Q.    -- about what your
16  testimony is.
17              Your view is that BOW and
18  Supermixer, vis-à-vis AdX and DFP, are
19  not dependencies.
20              MR. TESLICKO:  Object to
21          form.
22              THE WITNESS:  I would call
```

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```
 1  missed it, personally, I would
 2  be absolutely stunned.
 3        And based on Professor
 4  Weissman's credentials,
 5  expertise, and his work, I see
 6  no reason to even contemplate
 7  that hypothetical.
 8        You are suggesting that he
 9  doesn't have the -- truly, the
10  basic level of competence.
11        To give you an example of
12  how easy it is, I literally
13  would have to say, "Grab AdX
14  recursively," and I'm going to
15  get the whole thing.
16        And I personally cannot
17  imagine scenario in which an
18  expert of Professor Weissman's
19  caliber would be unfamiliar with
20  that.
21        But if you -- if you can
22  show me that, obviously, it
```

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```
 1        would change how I look at the
 2        stuff, because, then,
 3        information that I have been
 4        relying on is inaccurate.
 5  BY MS. RHEE:
 6        Q.    Okay.  So if it turned out
 7  Professor Weissman did not do what
 8  you're suggesting, which is run the tool
 9  at the top level of each of these
10  folders, but, instead, he actually went
11  to each of those folder paths and then
12  ran the count within each folder, what
13  would be your response to that
14  methodology?
15        A.    My --
16              MR. TESLICKO:  Object to
17        form.
18              THE WITNESS:  My response
19        would be that I've seen parts of
20        the tools that Professor
21        Weissman is using and they are
22        different than the ones I would
```

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```
 1        use.
 2              I would say that this is
 3        his area of expertise and not
 4        mine, and so, frankly, I'm
 5        looking forward to the
 6        opportunity to find out why he
 7        wouldn't use the things that I
 8        would use.  But it's also been
 9        six years since I last have done
10        it.
11              But I would be -- between
12        the two of us, I would trust his
13        tools more than I would trust
14        mine, and I know that my tools
15        would answer this in, like,
16        split second.
17              So on this topic, he is
18        the expert, and I'm just, you
19        know, a random person down the
20        street.
21  BY MS. RHEE:
22        Q.    So if it's Professor
```

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```
 1  Weissman's testimony that this Table 2
 2  is not meant to represent all of the
 3  available files or directories
 4  associated with AdX or DFP, how useful
 5  is it to you in your health check?
 6        A.    Very useful, because keep
 7  in mind that I am not using this table
 8  to say, oh, there is 400 -- sorry --
 9  4,659,000 lines of code.  That's not --
10  that number is irrelevant.
11              I'm looking for the
12  patterns.  I am -- these numbers inform
13  my decision on is this code base what I
14  would expect a Google3 code base to
15  behave like and look like.
16        Q.    I just want to pause --
17        A.    Mm-hmm.
18        Q.    -- because, at least in
19  earlier testimony, you told us the
20  reason why this was relevant to you --
21        A.    Mm-hmm.
22        Q.    -- is because the numbers
```

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```
 1   in the columns for BOW and Supermixer --
 2       A.    Mm-hmm.
 3       Q.    -- are bigger than the
 4   numbers in the columns for AdX and GFP.
 5            MR. TESLICKO:  Object to
 6       form.
 7   BY MS. RHEE:
 8       Q.    Fair?
 9       A.    No.  I told you that what
10   I'm looking for -- those are some of the
11   numbers that I'm looking for.
12            I'm looking to identify
13   utilities, and I know that the utilities
14   will be bigger than the other files and
15   so on.
16       Q.    Well, you're looking to see
17   if they are going to be bigger --
18       A.    Yes.
19       Q.    -- than the files, as you
20   put it, for AdX and DFP.
21       A.    That is correct.  Yes.
22       Q.    Okay.  So if it turns out
```

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```
 1   that, because what Dr. Weissman did in
 2   order to get to the counts for the
 3   columns associated with AdX and DFP are
 4   incomplete, and you don't actually know
 5   what those numbers are, how can you do
 6   the comparison of what those actual
 7   numbers are, to the numbers for the
 8   related utilities?
 9            MR. TESLICKO:  Object to
10       form.
11            THE WITNESS:  So Professor
12       Weissman used a process and a
13       methodology to obtain these
14       numbers.
15            My starting assumption is
16       that Professor Weissman did not
17       intentionally try to deceive the
18       court and has relied on his
19       expertise, so he has used
20       exactly the same process in all
21       four of these directories.
22            And, you know, maybe you
```

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```
 1   have information that shows
 2   otherwise, but this is my
 3   working premise.
 4            His analysis may have been
 5       incomplete, but it's going to be
 6       incomplete in that case.
 7            And -- and I do want to
 8       say, this is your stipulation.
 9       The parameters that I disagree
10       with, it's going to be
11       incomplete in exactly the same
12       way in all four of these --
13   BY MS. RHEE:
14       Q.    Well, you don't know that,
15   sitting here, right, because you don't
16   know -- because you don't know what's
17   contained underneath each of these
18   top-line directories, or, I guess, they
19   are referred to as top-level folders,
20   how many folders are associated with BOW
21   and Supermixer that are not part of
22   these particular folder paths that
```

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```
 1   Dr. Weissman describes, right?
 2            MR. TESLICKO:  Object to
 3       form.
 4            THE WITNESS:  So the issue
 5       here is the process, right.
 6            He is doing the process,
 7       trying to identify these files.
 8       Let's assume that that
 9       process -- and, again, I
10       disagree with this hypothetical
11       strongly.
12            And I am not trying to at
13       all suggest that Professor
14       Weissman would make this
15       mistake, because I don't -- if
16       you look at his credentials and
17       so on, as far as I'm concerned,
18       he is the expert in this area.
19            But, even, let's say,
20       entertaining your hypothetical,
21       he's using a process, and that
22       process will produce the same
```

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```
 1   type of an adder in all four of
 2   these columns.
 3        And what I'm looking for
 4   is things between them and
 5   things even around the columns,
 6   ratios, total numbers, and so
 7   on, to inform my opinion.
 8        So if you could give me
 9   any sort of description of what
10   kind of mistake could you be
11   thinking about that -- that we
12   could do, even, you know, me, if
13   I were doing this, that would
14   somehow make the mistakes in AdX
15   column but would leave the
16   remaining three correct, or the
17   other way around, I can't -- I
18   cannot imagine what that would
19   be.
20        You know, it's -- it's the
21   same code.  It's doing what you
22   tell it to do, and it's doing it
```

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```
 1        on all four of these, you know,
 2        at the same time.
 3   BY MS. RHEE:
 4        Q.   Okay.
 5        A.   But I do want to say, he is
 6   the expert.  I look at his credentials.
 7   And I go, like, this is a very low-level
 8   task.  It would be impossible for an
 9   expert of his caliber to make -- you
10   know, to make a mistake in that
11   particular field.
12        Q.   Okay.  You can put that
13   aside.
14             In your opening report, you
15   conclude that Google's operational
16   separation for DFP and AdX -- I'm sorry.
17             You talk about how AdX and
18   DFP already have operational separation.
19             Do you recall that?
20        A.   Yes, I do.
21        Q.   Okay.  I'm going to
22   actually --
```

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```
 1             MS. RHEE:  Let's mark for
 2        this deposition Exhibit 4, which
 3        is your opening report.
 4             THE WITNESS:  All right.
 5        I have a copy of it, so --
 6   BY MS. RHEE:
 7        Q.   Well, I'm going to give it
 8   to you.
 9        A.   All right.
10        Q.   Because we have to have a
11   marked copy.
12        A.   No problem.
13             (Document marked for
14        identification as Bjedov
15        Exhibit 4.)
16   BY MS. RHEE:
17        Q.   All right.  So I'm going to
18   direct your attention to Page 47,
19   Paragraph 116.
20             And you can keep me honest.
21   These are your words in your report.
22             "Google distinguishes
```

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```
 1   between 'AdX Serving' and 'DFP Serving,'
 2   which reflects operational separation in
 3   service deployment and management."
 4             Yes?
 5        A.   Yes.
 6        Q.   Okay.  From your report?
 7        A.   Mm-hmm.
 8        Q.   And those are your words?
 9        A.   Yes.
10        Q.   You wrote those?
11        A.   My team and I worked
12   together, but I proofread and approved
13   every word in the -- in the whole
14   report.
15        Q.   Okay.  So even if they
16   aren't your words, you approved of them?
17        A.   No, no, no.  The words are
18   mine with the exception of articles,
19   which you have probably noticed all of
20   those were more or less added by
21   somebody else who English-proofread the
22   paper.
```

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```
 1        form.
 2   BY MS. RHEE:
 3        Q.    You -- you didn't look at,
 4   for example, internal Google documents
 5   at that time.  Okay.
 6             COURT REPORTER:  You have
 7        to answer out loud.  Sorry.
 8             THE WITNESS:  No, I
 9        didn't.
10   BY MS. RHEE:
11        Q.    Okay.  Just based on your
12   answer, I want to understand, in your
13   thinking about dependencies --
14        A.    Mm-hmm.
15        Q.    -- in your first stage of
16   coming up with your expectation about
17   the number of dependencies there would
18   be and how long it would take to replace
19   them.
20        A.    Mm-hmm.
21        Q.    Did you look at and/or rely
22   on Professor Weissman in your Stage I
```

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```
 1   process?
 2        A.    No.
 3             MR. TESLICKO:  Object to
 4        form.
 5   BY MS. RHEE:
 6        Q.    Okay.  That's very helpful.
 7   I see.
 8             So your reliance on
 9   Professor Weissman is in your, as I
10   think you put it, pressure testing, or
11   testing of your Stage I opinion?
12             MR. TESLICKO:  Object to
13        form.
14             THE WITNESS:  I would say
15        it is during the step where you
16        refine your opinion.
17             Again, AdX is an Ad
18        Exchange.
19             I have actually,
20        firsthand, worked on complete
21        migration, partially write and
22        just a whole mess of an Ad
```

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```
 1        Exchange.
 2             And so I have a reasonable
 3        starting point to say, I know
 4        how many dependencies I should
 5        be dealing with here.
 6             And I make my own
 7        estimates around that, and I do
 8        my work related to that.
 9   BY MS. RHEE:
10        Q.    And you did all of that
11   without looking at or relying on
12   Professor Weissman or any of his work?
13        A.    That is correct.
14        Q.    I see.  Okay.
15             And then I take it from
16   your answer, when you got to the point
17   where you looked at Professor Weissman's
18   opinion and his work, it confirmed for
19   you your initial assessment and your
20   expectation.
21             Is that -- have I got that
22   right?
```

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```
 1        A.    That is fair to say.  We
 2   were roughly talking about, let's say,
 3   the same -- certainly, the same order of
 4   magnitude.
 5        Q.    I see.
 6             Okay.  But you didn't need
 7   him or rely on him to get to your
 8   original estimates?
 9        A.    No.
10             MR. TESLICKO:  Object to
11        form.
12   BY MS. RHEE:
13        Q.    Okay.  And you got to your
14   original estimates -- I just want to
15   understand -- again, based on your own
16   experience?
17        A.    My personal experience with
18   migrating a similar-type product or --
19   you can even call it the same, but
20   probably not the same.
21        Q.    Okay.  Which product is
22   that?
```

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```
12              And I was the only
13    performance and capacity engineer
14    involved in that whole product.
15         Q.    Okay.  And so that's the
16    experience that you relied upon in
17    making your original estimates?
18              MR. TESLICKO:  Object to
19         form.
20              THE WITNESS:  That is the
21         experience I called on.  One of
22         the things that I've done in the
```

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```
1    that AdX and DFP will be migrated first
2    to the Google public cloud?
3         A.    I am proposing what I would
4    call one reasonable option, but I'm not
5    saying that other people could not come
6    up with other reasonable options that,
7    you know, go to different destination
8    and so on.
9              Just one reasonable option,
10    and in my option, I propose going to
11    Google public cloud, yes.
12         Q.    Okay.  And that option that
13    you put forth --
14         A.    Mm-hmm.
15         Q.    -- which is that AdX and
16    DFP first get migrated to the Google
17    public cloud, that impacts your
18    estimated timelines that you put forth
19    for all of the downstream steps, right?
20              MR. TESLICKO:  Object to
21         form.
22              THE WITNESS:  Yes and a
```

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```
1    past but certainly not, you
2    know, the only.
3         It's -- I would say it's
4    the closest.  But there are, you
5    know, other things that you get
6    involved with that you can
7    reasonably say they may not be
8    ad exchange but they will
9    require the same dependencies.
10    BY MS. RHEE:
11         Q.    Okay.
12              MS. RHEE:  Why don't we
13    take a quick break.
14              MR. TESLICKO:  Great.
15              THE VIDEOGRAPHER:  Off the
16    record at 2:18.
17              (Short break.)
18              THE VIDEOGRAPHER:  On the
19    record at 2:32.
20    BY MS. RHEE:
21         Q.    Okay.  New topic.
22              Your migration plan assumes
```

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```
1    no.
2         The reason why I suggest
3    you should go -- you should
4    consider going to Google public
5    cloud is because I have
6    guarantee that I will have
7    expertise available on Google
8    public cloud and, obviously, on
9    Google public -- private cloud
10    available to me at the time of
11    divestiture.
12         If, for example, let's say
13    Amazon were to decide and be a
14    buyer -- and this is me just
15    picking a person out of thin
16    air.  I have no idea if they are
17    in any way, shape, or form,
18    one -- but they are the owners
19    of their own cloud, right.  So
20    they are the owners of AWS and
21    S3.
22         And so if a potential
```

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1   And --
2   BY MS. RHEE:
3   Q.   You mean a software
4   engineer?
5   A.   Software engineer from the
6   product team, yes.
7   And you should be able to
8   get this done in a couple of days.
9   Q.   Okay. I just want to --
10   A.   Mm-hmm.
11   Q.   Thank you for the
12 clarification.
13   A.   No problem.
14   Q.   I am not an engineer, so I
15 now want to just clarify.
16   Your testimony today is
17 that you believe you really just need
18 one performance engineer, one site
19 reliability engineer, and one software
20 engineer from the product team working
21 over a couple of days?
22   A.   Yeah. To get this done.

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1   Q.   Okay. And this is the
2   first stage of your migration plan that
3   you labeled "Deployment Analysis"?
4   A.   "Deployment Analysis," yes.
5   Q.   Okay. All right.
6   And the second stage of
7   your --
8   A.   Mm-hmm.
9   Q.   -- four-stage migration
10 plan you call "Technical Decoupling,"
11 correct?
12   A.   Correct.
13   Q.   Okay. And that's the stage
14 of your migration plan that you believe
15 will take the most amount of time,
16 correct?
17   A.   That is correct, yes.
18   Q.   Okay. And that stage is
19 evaluating the replacements for all of
20 the dependencies for AdX and DFP and
21 then choosing the best replacement
22 options?

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1   MR. TESLICKO: Object to
2   form.
3   THE WITNESS: No. What --
4   what you're doing in that stage
5   is -- so you have found the
6   systems that you are relying on
7   and you need to replace.
8   Not only are you picking a
9   system that you will be
10 eventually replacing it with,
11 but you actually are doing the
12 cuts.
13   You are -- in the first
14 stage -- and how I would suggest
15 that they do this -- is
16 basically write a simple
17 passthrough calls, and so you --
18 you kind of add a layer. You
19 can call it a mock, if you like.
20   And in the first stage
21 that thing does nothing but
22 passes through the call that

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1   will then go to whatever is
2   still currently the system
3   supporting AdX in a Google
4   private cloud.
5   Once you have identified
6   all of those, let's say, for
7   database, because that is the
8   one that I believe should start
9   first, the -- the first thing
10 that I would do is verify did we
11 really identify all of those
12 correctly.
13   And now because all of the
14 calls are going through the
15 mock, that is relatively easy to
16 do.
17   I sort of disable the
18 mock, and if the database is
19 still getting calls from me,
20 that means that there are places
21 that I've missed them, and I
22 have to go and find them as well

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1 and redirect them to go to my	1 making my time estimates is, honestly,
2 mock implementation of the call,	2 how would I feel if somebody told me, do
3 which is doing nothing but doing	3 this in this amount of time. And if I
4 the passthrough.	4 would feel like, ooh, that's -- that's
5 At this point in time, I	5 tight. It's possible but tight.
6 have all of the database calls	6 That is not going to be the
7 listed in one place and	7 estimate I'm going to give, because I
8 available to me.	8 don't think -- I don't think that's fair
9 And, hopefully, by this	9 to the engineers who are tasked with the
10 point in time, we have decided	10 job.
11 to -- as to what is going to be	11 And so the way I come up
12 our replacement.	12 with something like eight months is, of
13 But let's say we haven't.	13 all the systems that we have talked
14 This would be a great place and	14 about, F1 is going to be the most
15 opportunity to say, you know,	15 complex replacement, in my opinion.
16 let's -- let's speak to	16 I would be surprised if I'm
17 different replacement	17 wrong about that.
18 candidates. And we have all of	18 You know, if there are some
19 this code in front of us. Let's	19 other databases that they are calling,
20 just write substitute APIs for	20 they will be really small compared to
21 two different databases, if	21 the -- to the F1 stuff.
22 that's what we are choosing.	22 And so I look at it, and I

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1 But this is also a place	1 say, given the size that I have been
2 that, if you have a buyer	2 told about the system, how much time
3 already identified, you can get	3 would it take to migrate a database of
4 their input on what is the	4 that size into the new environment.
5 replacement system they would	
6 like.	
7 And, fundamentally, you	
8 just have to rewrite those APIs.	
9 BY MS. RHEE:	
10 Q. Okay. And sitting here	
11 today --	
12 A. Or API calls.	
13 Q. Sitting here today, what is	
14 your opinion about how long this step or	
15 stage in the -- your four-step migration	
16 plan, it would take?	
17 A. So I have given that stage	
18 eight months, and I -- when I make these	
19 kinds of determinations, in general --	
20 I've been called a pessimist, so just so	
21 you know.	
22 But the way I look at	

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```
20          MR. TESLICKO:  Object to
21       form.
```

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(content redacted)

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(content redacted)

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```
6           MR. TESLICKO:  Object to
7        form.

15   BY MS. RHEE:
16       Q.    Okay.  That's what I wanted
17   to understand.
18       A.    Yeah.  No problem.
19       Q.    And -- okay.  So that's
20   Stage II of your migration plan.
21       A.    Mm-hmm.
22       Q.    You think it will take no
```

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```
 1          form.
 2     BY MS. RHEE:
 3          Q.     Oh, you did?
 4          A.     Oh, yeah.  I mean, pretty
 5     much if it happened at Facebook between,
 6     let's say, 2011 and 2015, and it
 7     involved servers and hardware and the
 8     data centers, I was --
 9          Q.     You were involved?
10          A.     Yeah.
```


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```
21          A.     Oh, I --
22               MR. TESLICKO:  Object to
```

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```
11          At Google, that priority is
12   search.  You take the Search away,
13   the -- you know, people are not just
14   going to come to see ads.  You have to
15   put Search above everything else.  And
16   then you put ads.
17          And now you're looking at
18   maybe Gmail as another, you know, viable
19   thing that you have to watch out for.
20          You know, at Facebook there
21   are other products.  They also make some
22   money and so on.  But you have to take
```